

Fill in this information to identify the case:

United States Bankruptcy Court for the:

Northern District of Ohio
(State)

Case number (if known): Chapter 7

☐ Check if this is an amended filing

Official Form 205

Involuntary Petition Against a Non-Individual

12/15

Use this form to begin a bankruptcy case against a non-individual you allege to be a debtor subject to an involuntary case. If you want to begin a case against an individual, use the *Involuntary Petition Against an Individual* (Official Form 105). Be as complete and accurate as possible. If more space is needed, attach any additional sheets to this form. On the top of any additional pages, write debtor's name and case number (if known).

Part 1: Identify the Chapter of the Bankruptcy Code Under Which Petition Is Filed

1. Chapter of the Bankruptcy Code

Check one:

- ☒ Chapter 7
☐ Chapter 11

Part 2: Identify the Debtor

2. Debtor's name

Mammoth Tech, Inc.

3. Other names you know the debtor has used in the last 8 years

Include any assumed names, trade names, or doing business as names.

4. Debtor's federal Employer Identification Number (EIN)

☐ Unknown

34 - 0941570
EIN

5. Debtor's address

Principal place of business

1250 Geneva Blvd
Number Street

Defiance OH 43512
City State ZIP Code

Defiance
County

Mailing address, if different

Number Street

P.O. Box

City State ZIP Code

Location of principal assets, if different from principal place of business

Number Street

City State ZIP Code

Debtor

Name

Case number (if known)

6. Debtor's website (URL) _____

7. Type of debtor

- ☒ Corporation (including Limited Liability Company (LLC) and Limited Liability Partnership (LLP))
☐ Partnership (excluding LLP)
☐ Other type of debtor. Specify: _____

8. Type of debtor's business

Check one:

- ☐ Health Care Business (as defined in 11 U.S.C. § 101(27A))
☐ Single Asset Real Estate (as defined in 11 U.S.C. § 101(51B))
☐ Railroad (as defined in 11 U.S.C. § 101(44))
☐ Stockbroker (as defined in 11 U.S.C. § 101(53A))
☐ Commodity Broker (as defined in 11 U.S.C. § 101(6))
☐ Clearing Bank (as defined in 11 U.S.C. § 781(3))
☒ None of the types of business listed.
☐ Unknown type of business.

9. To the best of your knowledge, are any bankruptcy cases pending by or against any partner or affiliate of this debtor?

- ☒ No
☐ Yes. Debtor _____ Relationship _____
District _____ Date filed _____ Case number, if known _____
MM / DD / YYYY
Debtor _____ Relationship _____
District _____ Date filed _____ Case number, if known _____
MM / DD / YYYY

Part 3:**Report About the Case**

10. Venue

Check one:

- ☒ Over the last 180 days before the filing of this bankruptcy, the debtor had a domicile, principal place of business, or principal assets in this district longer than in any other district.
☐ A bankruptcy case concerning debtor's affiliates, general partner, or partnership is pending in this district.

11. Allegations

Each petitioner is eligible to file this petition under 11 U.S.C. § 303(b).

The debtor may be the subject of an involuntary case under 11 U.S.C. § 303(a).

At least one box must be checked:

- ☒ The debtor is generally not paying its debts as they become due, unless they are the subject of a bona fide dispute as to liability or amount.
☐ Within 120 days before the filing of this petition, a custodian, other than a trustee, receiver, or an agent appointed or authorized to take charge of less than substantially all of the property of the debtor for the purpose of enforcing a lien against such property, was appointed or took possession.

12. Has there been a transfer of any claim against the debtor by or to any petitioner?

- ☒ No
☐ Yes. Attach all documents that evidence the transfer and any statements required under Bankruptcy Rule 1003(a).

Debtor Mammoth Tech, Inc.
Name

Case number (if known) _____

13. Each petitioner's claim

Name of petitioner

Nature of petitioner's claim

Amount of the claim
above the value of
any lien

Theresa Leininger

Unpaid WARN Act judgment

\$ 4,816

Rachel Youngker

Unpaid WARN Act judgment

\$ 11,538.42

Shawand Ebanks

Unpaid WARN Act judgment

\$ 4,816

Total of petitioners' claims

\$ 21,170.42

If more space is needed to list petitioners, attach additional sheets. Write the alleged debtor's name and the case number, if known, at the top of each sheet. Following the format of this form, set out the information required in Parts 3 and 4 of the form for each additional petitioning creditor, the petitioner's claim, the petitioner's representative, and the petitioner's attorney. Include the statement under penalty of perjury set out in Part 4 of the form, followed by each additional petitioner's (or representative's) signature, along with the signature of the petitioner's attorney.

Part 4: Request for Relief

WARNING -- Bankruptcy fraud is a serious crime. Making a false statement in connection with a bankruptcy case can result in fines up to \$500,000 or imprisonment for up to 20 years, or both. 18 U.S.C. §§ 152, 1341, 1519, and 3571.

Petitioners request that an order for relief be entered against the debtor under the chapter of 11 U.S.C. specified in this petition. If a petitioning creditor is a corporation, attach the corporate ownership statement required by Bankruptcy Rule 1010(b). If any petitioner is a foreign representative appointed in a foreign proceeding, attach a certified copy of the order of the court granting recognition.

I have examined the information in this document and have a reasonable belief that the information is true and correct.

Petitioners or Petitioners' Representative

Name and mailing address of petitioner

Theresa Leininger

Name

22314 Banner School Rd

Number Street

Defiance

City

OH

State

43512

ZIP Code

Name and mailing address of petitioner's representative, if any

Name

Number Street

City

State

ZIP Code

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 12/06/2023
MM / DD / YYYY

☒ /s/ Theresa Leininger

Signature of petitioner or representative, including representative's title

Attorneys

John N. Childs

Printed name

Brennan, Manna & Diamond

Firm name, if any

75 East Market Street

Number Street

Akron

City

OH

State

44308

ZIP Code

Contact phone 330-253-1946 Email jnchilds@bmdllc.com

Bar number 0023489

State Ohio

☒

Signature of attorney

Date signed 01/22/2024
MM / DD / YYYY

Debtor

Mammoth Tech, Inc.
Name

Case number (if known) _____

Name and mailing address of petitioner

Rachel Youngker

Name

13469 Fullmer Rd

Number Street

Defiance

City

OH

State

43512

ZIP Code

Name and mailing address of petitioner's representative, if any

Name

Number Street

City

State

ZIP Code

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 12/06/2023
MM / DD / YYYY☒ /s/ Rachel Youngker

Signature of petitioner or representative, including representative's title

John N. Childs

Printed name

Brennan, Manna & Diamond

Firm name, if any

75 East Market Street

Number Street

Akron

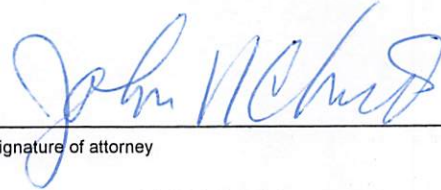
City

OH

State

44308

ZIP Code

Contact phone 330-253-1946 Email jnchilds@bmdllc.comBar number 0023489State Ohio☒

Signature of attorney

Date signed 01/22/2024
MM / DD / YYYY

Name and mailing address of petitioner

Shawand Ebanks

Name

18931 Pine Ridge Lane

Number Street

Germantown

City

MD

State

20874

ZIP Code

Name and mailing address of petitioner's representative, if any

Name

Number Street

City

State

ZIP Code

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 12/06/2023
MM / DD / YYYY☒ /s/ Shawand Ebanks

Signature of petitioner or representative, including representative's title

John N. Childs

Printed name

Brennan, Manna & Diamond

Firm name, if any

75 East Market St.

Number Street

Akron

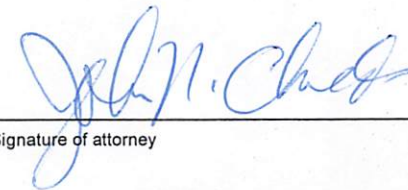
City

OH

State

44308

ZIP Code

Contact phone 330-253-1946 Email jnchilds@bmdllc.comBar number 0023489State Ohio☒

Signature of attorney

Date signed 01/22/2024
MM / DD / YYYY

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF OHIO**

In re: MAMMOTH TECH, INC. Alleged Debtor	Case No.
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**DECLARATION IN SUPPORT OF
AN INVOLUNTARY PETITION AGAINST MAMMOTH TECH, INC.**

1. I, Rachel Youngker, am a former employee of Mammoth Tech, Inc (“Alleged Debtor” or “Defendant”). I worked at the Alleged Debtor’s facility located at 1250 Geneva Boulevard, Defiance, OH (the “Facility”) until the Alleged Debtor terminated me on or about March 2, 2022, along with hundreds of other employees who worked at, or reported to, or were assigned work from the Facility, without cause on our part as a result of the shutdown of Alleged Debtor’s business (“Similarly Situated Employees”).

2. I currently reside in Defiance, OH.

3. On March 11, 2022, Theresa Leininger filed a class action complaint in the United States District Court for the Northern District of Ohio (the “WARN Litigation”) on behalf of herself and on behalf of all similarly situated former employees against Alleged Debtor to recover sixty (60) days’ pay and benefits under the Worker Adjustment and Retraining Notification (WARN) Act of 1988 (29 U.S.C. §§ 2101 - 2109). Case No.: 3:22-cv-00394-JZ.

4. The Alleged Debtor failed to answer the complaint and has failed to appear or otherwise defend the WARN Litigation.

5. On November 3, 2022, the Court entered an Order certifying a class pursuant to Fed. R. Civ. P. 23 comprised of all former employees of Defendant who worked at, or reported to, or were assigned work from the facility located at 1250 Geneva Boulevard,

Defiance, OH 43512 and were terminated, without cause on their part, on or about March 2, 2022 and thereafter, who do not file a timely request to opt-out of the class (the “Class”); (b) appointing Plaintiff as Class Representative; (c) appointing The Gardner Firm, P.C., Lankenau & Miller, LLP and Brennan, Manna & Diamond, LLC as Class Counsel; (d) approving the form and manner of Notice to the Class. Notice to the class was to be mailed within ten days of entry of the Order and any Class members who wished to opt-out were to complete and submit the opt-out form (included with the Class Notice) so that it was received no later than thirty-five days after the date of mailing. All requests for exclusion received after that date would not be effective, and any person who sent a late request would be a member of the Class and would be bound in the same way and to the same extent as all other Class Members.

6. The Court-approved Class Notice was mailed to the Class Members on November 11, 2022 and contained an opt-out deadline of December 16, 2022. Only one Class member chose to exclude by submitting a timely opt-out form.

7. On March 1, 2023, Theresa Leininger filed a motion for default judgment seeking WARN Act wages under 29 U.S.C. §2104(a)(1)(A) “(the WARN Act)” in the aggregate of, Two Million Four Hundred Three Thousand Six Hundred Sixty-Seven Dollars and Ninety-Eight Cents (\$2,403,667.98) for herself/myself and each of the Class Members as reflected on the attached Class Spreadsheet (Exhibit 1).

8. On March 29, 2023 the Court entered the attached judgment in favor of the Plaintiff Class in the aggregate amount of Two Million Four Hundred Three Thousand Six Hundred Sixty-Seven Dollars and Ninety-Eight Cents (\$2,403,667.98) (Exhibit 2).

9. As of December 5, 2023, there remains due the entire sum of \$2,403,667.98 by Mammoth Tech, Inc., none of which has been paid.

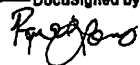
1. I personally hold an unsecured claim of \$11,538.42 owed by Mammoth Tech, Inc. as part of the judgment entered against Mammoth Tech. (See attached Exhibit 1).

2. I have signed an Involuntary Petition to evidence my joinder to the Petition.

3. The claim is unsecured, liquidated, noncontingent and is not subject to a bona fide dispute.

4. I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Executed on December 05, 2023

DocuSigned by:
 12/5/2023
A9D639F7D4E24DB...

By: _____

EXHIBIT 1

	Last Name	First Name	Hourly Rate	Salary/Hourly	Full/Part Time	WARN Wage Damages
1	Adedun	Doyin	14.0000	Hourly	Full Time	4,816.00
2	Agyei	Grace B.	14.0000	Hourly	Part Time	2,820.00
3	Akers	Elonda	14.0000	Hourly	Full Time	4,816.00
4	Anderson	Reslyn	14.0000	Hourly	Full Time	4,816.00
5	Anderson (Blair)	Chrisi A.	72.1154	Salaried	Full Time	24,725.19
6	Ankobia	Ma'at	14.0000	Hourly	Full Time	4,816.00
7	Anthony	Daniel R.	14.0000	Hourly	Part Time	2,460.00
8	Arif	Saiyeda B.	16.0000	Hourly	Full Time	5,504.00
9	Arreola	Miguel B.	14.0000	Hourly	Part Time	3,360.00
10	Arreola	Renee J.	32.6923	Salaried	Full Time	11,208.75
11	Aschliman	Sarah A.	14.0000	Hourly	Full Time	4,816.00
12	Athy	Ashly D.	14.7500	Hourly	Full Time	5,074.00
13	Atkinson	Dejon	15.0000	Hourly	Full Time	5,160.00
14	Avalos	Angel D.	15.0000	Hourly	Full Time	5,160.00
15	Avila	Kristy	15.0000	Hourly	Full Time	5,160.00
16	Baker	Danielle	14.0000	Hourly	Full Time	4,816.00
17	Barbato	Rachel	14.0000	Hourly	Full Time	4,816.00
18	Barker	Mary J.	14.0000	Hourly	Full Time	4,816.00
19	Barnette	Saeqwon	15.0000	Hourly	Part Time	2,828.57
20	Barnhart	Josiah	14.0000	Hourly	Part Time	2,640.00
21	Barrie	Salamatu	14.0000	Hourly	Part Time	2,400.00
22	Battle	Bria	14.0000	Hourly	Full Time	4,816.00
23	Battle	Khalid	14.0000	Hourly	Full Time	4,816.00
24	Baun	Christopher	14.0000	Hourly	Full Time	4,816.00
25	Baxter	Kobe W.	14.0000	Hourly	Part Time	3,840.00
26	Beader	Jessica	14.0000	Hourly	Full Time	4,816.00
27	Beard	Brittany	14.0000	Hourly	Full Time	4,816.00
28	Becker	Jasmine	14.0000	Hourly	Full Time	4,816.00
29	Belcher	Skyeler R.	18.2692	Salaried	Full Time	6,263.72
30	Bell	Cory	14.0000	Hourly	Part Time	3,000.00
31	Bell	Daphne	14.0000	Hourly	Full Time	4,816.00
32	Benitez	Briana	15.0000	Hourly	Full Time	5,160.00
33	Bernard	Sydney N.	14.0000	Hourly	Full Time	4,816.00
34	Berry	Ross M.	28.8461	Salaried	Full Time	9,890.06
35	Bethuy	Melanie	14.0000	Hourly	Full Time	4,816.00
36	Bird	Matthew	14.0000	Hourly	Full Time	4,816.00
37	Bird	Sara Ann E.	16.0000	Hourly	Full Time	5,504.00
38	Bishop	Teresa A.	14.0000	Hourly	Full Time	4,816.00
39	Blevins	Sarah	14.0000	Hourly	Part Time	2,100.00
40	Bloom	Amari	14.0000	Hourly	Full Time	4,816.00
41	Boas	Ian M.	15.0000	Hourly	Full Time	5,160.00
42	Bollett Sr.	Christopher S.	14.0000	Hourly	Full Time	4,816.00
43	Bonifas	Torey D.	35.4327	Salaried	Full Time	12,148.31
44	Boop	Jaide C.	14.0000	Hourly	Full Time	4,816.00
45	Bowen	Carrie V.	14.0000	Hourly	Full Time	4,816.00
46	Boyce	Nicole R.	16.0000	Hourly	Full Time	5,504.00
47	Branham	Danielle L.	24.0385	Salaried	Full Time	8,241.73
48	Branham	Kayla L.	14.7500	Hourly	Full Time	5,074.00
49	Brinkman	Mairi	15.0000	Hourly	Full Time	5,160.00
50	Brock	Brandon	14.0000	Hourly	Full Time	4,816.00
51	Brock	Samantha	14.0000	Hourly	Full Time	4,816.00
52	Brooks	Morissa L.	14.0000	Hourly	Full Time	4,816.00
53	Brooks	Shamya	14.0000	Hourly	Full Time	4,816.00
54	Brown	Brianna	15.0000	Hourly	Part Time	2,700.00
55	Brown	Phylena	15.0000	Hourly	Full Time	5,160.00

	Last Name	First Name	Hourly Rate	Salary/Hourly	Full/Part Time	WARN Wage Damages
56	Brown	Savannah	14.0000	Hourly	Full Time	4,816.00
57	Brown	Shanya	14.0000	Hourly	Full Time	4,816.00
58	Brown	Zakyela R.	15.0000	Hourly	Full Time	5,160.00
59	Bryan	Melissa J.	14.0000	Hourly	Full Time	4,816.00
60	Buford	Latoya	14.0000	Hourly	Full Time	4,816.00
61	Burke	Danielle	14.0000	Hourly	Full Time	4,816.00
62	Burton	Kenzel B.	14.0000	Hourly	Full Time	4,816.00
63	Butler	Amber	14.0000	Hourly	Full Time	4,816.00
64	Butler	Kelly T.	14.0000	Hourly	Full Time	4,816.00
65	Cage	Aaliyah M.	15.0000	Hourly	Full Time	5,160.00
66	Calcagno	Kayla	14.0000	Hourly	Part Time	2,880.00
67	Cannon	Kathryn L.	17.4200	Hourly	Full Time	5,992.48
68	Cannon	Shana	14.0000	Hourly	Full Time	4,816.00
69	Cantu	Karleigh A.	14.0000	Hourly	Full Time	4,816.00
70	Caraballo	Danny	15.0000	Hourly	Full Time	5,160.00
71	Caraballo	Sandra J.	15.0000	Hourly	Full Time	5,160.00
72	Carbonel	Dominique	15.0000	Hourly	Full Time	5,160.00
73	Carmona	Crystal	15.0000	Hourly	Full Time	5,160.00
74	Cashaw	Cameron	15.0000	Hourly	Part Time	2,635.71
75	Caywood	Briana	14.0000	Hourly	Full Time	4,816.00
76	Celestin	Kristen	14.0000	Hourly	Full Time	4,816.00
77	Celi	Michael	14.0000	Hourly	Full Time	4,816.00
78	Cerda	Jessica	15.0000	Hourly	Full Time	5,160.00
79	Chesebro	Tamara G.	26.4423	Hourly	Full Time	9,096.15
80	Chiles	Brittany L.	14.0000	Hourly	Full Time	4,816.00
81	Ciecierski	Kayla B.	14.0000	Hourly	Full Time	4,816.00
82	Clark	Shakira	14.0000	Hourly	Full Time	4,816.00
83	Clarke	Courtney J.	14.0000	Hourly	Full Time	4,816.00
84	Clarke	Shaniya	14.0000	Hourly	Full Time	4,816.00
85	Clay	Patrick T.	14.0000	Hourly	Full Time	4,816.00
86	Cobb	Alex M.	14.0000	Hourly	Full Time	4,816.00
87	Colbert	Alissa N.	14.0000	Hourly	Full Time	4,816.00
88	Condon	Laurie L.	18.4000	Hourly	Full Time	6,329.60
89	Connell	Terriann	15.0000	Hourly	Full Time	5,160.00
90	Conner	Albert	14.0000	Hourly	Part Time	2,280.00
91	Cooke	Maya	14.0000	Hourly	Full Time	4,816.00
92	Cooke	Mona	15.0000	Hourly	Part Time	2,828.57
93	Cooper	Jocile S.	14.0000	Hourly	Full Time	4,816.00
94	Cordes	Madeline M.	22.9558	Salaried	Full Time	7,870.52
95	Coressel	Jade N.	14.0000	Hourly	Full Time	4,816.00
96	Corley	Christina	15.0000	Hourly	Full Time	5,160.00
97	Costa	Chelsey M.	15.0000	Hourly	Full Time	5,160.00
98	Creekmore	Sherril	14.0000	Hourly	Full Time	4,816.00
99	Creer	Brennen J.	120.1923	Salaried	Full Time	41,208.65
100	Cunningham	Tenise	15.0000	Hourly	Full Time	5,160.00
101	Cutcher	Madyson	14.0000	Hourly	Full Time	4,816.00
102	Dangler	Erica L.	19.0000	Hourly	Full Time	6,536.00
103	Daniels	Arianna M.	14.0000	Hourly	Full Time	4,816.00
104	David	Samuel	14.0000	Hourly	Full Time	4,816.00
105	Day	Skyler J.	14.0000	Hourly	Full Time	4,816.00
106	Dean	Nicholas W.	40.8654	Salaried	Full Time	14,010.94
107	Deon-Jones	Carolyn	15.0000	Hourly	Full Time	5,160.00
108	Dey	Ashley	14.0000	Hourly	Full Time	4,816.00
109	Diallo	Abdoulaye	14.0000	Hourly	Full Time	4,816.00
110	Distasio	Penny	14.0000	Hourly	Full Time	4,816.00

	Last Name	First Name	Hourly Rate	Salary/Hourly	Full/Part Time	WARN Wage Damages
111	Dixon	Jazzmany	14.0000	Hourly	Full Time	4,816.00
112	Dixon	Vanessa	14.0000	Hourly	Part Time	4,800.00
113	Donald	Tanaiya	14.0000	Hourly	Full Time	4,816.00
114	Donaldson	James A.	15.0000	Hourly	Full Time	5,160.00
115	Douglas	Kulashawndrea I.	16.0000	Hourly	Full Time	5,504.00
116	Downard	Serina	14.0000	Hourly	Full Time	4,816.00
117	Drees	Isaac J.	18.2200	Hourly	Full Time	6,267.68
118	Dukes	Jennifer R.	26.9800	Hourly	Full Time	9,281.12
119	Dulyea	Jessica	14.0000	Hourly	Part Time	2,520.00
120	Duma	Lori J.	16.0000	Hourly	Full Time	5,504.00
121	Duncan II	Christopher	14.0000	Hourly	Full Time	4,816.00
122	Dunn	Lindsay	14.0000	Hourly	Full Time	4,816.00
123	Duran	Gloria Y.	15.0000	Hourly	Full Time	5,160.00
124	Durden	Ayana S.	14.0000	Hourly	Full Time	4,816.00
125	Earl	Sonya	15.0000	Hourly	Full Time	5,160.00
126	Eason	David P.	17.2788	Salaried	Full Time	5,924.16
127	Ebanks	Shawand S.	14.0000	Hourly	Full Time	4,816.00
128	Edwards	Kenzie M.	14.0000	Hourly	Full Time	4,816.00
129	Edwards	Peterson D.	14.0000	Hourly	Full Time	4,816.00
130	Edwards	Tytiana T.	14.0000	Hourly	Full Time	4,816.00
131	Elkins	Amy M.	20.4800	Hourly	Full Time	7,045.12
132	Escarment	Verlencia	15.0000	Hourly	Part Time	2,828.57
133	Espejo	Amelia R.	14.0000	Hourly	Full Time	4,816.00
134	Essex	Kaytlyn	14.0000	Hourly	Full Time	4,816.00
135	Ferrell	Tashya	14.0000	Hourly	Full Time	4,816.00
136	Fifer	Breanne C.	21.6346	Salaried	Full Time	7,417.56
137	Fishpaw	Austin A.	18.0000	Hourly	Full Time	6,192.00
138	Flanagan	Lorraine	14.0000	Hourly	Full Time	4,816.00
139	Flanary	Coralee D.	14.0000	Hourly	Full Time	4,816.00
140	Fleming	Rachel J.	28.8462	Salaried	Full Time	9,890.08
141	Fletcher	Cherish B.	14.0000	Hourly	Full Time	4,816.00
142	Flowers	Mesha D.	36.0577	Salaried	Full Time	12,362.60
143	Fortman	Sara	14.0000	Hourly	Full Time	4,816.00
144	Foxworth	Shaunte	14.0000	Hourly	Part Time	1,260.00
145	Francis	Sharmilla	15.0000	Hourly	Part Time	2,828.57
146	Francois	Kenyardi M.	14.0000	Hourly	Full Time	4,816.00
147	Franklin-Griffin	Kayla L.	16.8269	Salaried	Full Time	5,769.21
148	Frazier	Jasmine	15.0000	Hourly	Full Time	5,160.00
149	Fredrick	Melody R.	22.1154	Salaried	Full Time	7,582.39
150	Frost	Breanna	15.0000	Hourly	Full Time	5,160.00
151	Fuentes	Danielle N.	27.8800	Salaried	Full Time	9,558.83
152	Fuseller	Brian	14.0000	Hourly	Full Time	4,816.00
153	GARCIA	LATRINA	14.0000	Hourly	Full Time	4,816.00
154	Garrett	Quiana	15.0000	Hourly	Full Time	5,160.00
155	Garrett	Taquilla R.	15.0000	Hourly	Full Time	5,160.00
156	Gibbs	Shakira	14.0000	Hourly	Full Time	4,816.00
157	Gibbs	Shyenne	14.0000	Hourly	Full Time	4,816.00
158	Gilliard	Theodosha	14.0000	Hourly	Full Time	4,816.00
159	Gleaton	Tamara	14.0000	Hourly	Full Time	4,816.00
160	Gomez	Fernando J.	26.4423	Salaried	Full Time	9,065.90
161	Goodwyn	Quaaneiruh	14.2500	Hourly	Full Time	4,902.00
162	Graff	Brittnee	14.0000	Hourly	Part Time	2,460.00
163	Grant	Abigail	14.0000	Hourly	Full Time	4,816.00
164	Grant	Addi J.	20.0000	Hourly	Full Time	6,880.00
165	Green	Jada	14.0000	Hourly	Full Time	4,816.00

	Last Name	First Name	Hourly Rate	Salary/Hourly	Full/Part Time	WARN Wage Damages
166	Greene	Megan M.	24.0385	Hourly	Full Time	8,269.23
167	Green-Harris	Raven	14.0000	Hourly	Full Time	4,816.00
168	Griffin Jr.	Stephen L.	14.0000	Hourly	Full Time	4,816.00
169	Gullufsen	Krista	14.0000	Hourly	Part Time	3,120.00
170	Hannah	Faith L.	14.0000	Hourly	Full Time	4,816.00
171	Hanna-Martinez	Sophia T.	16.0000	Hourly	Full Time	5,504.00
172	Hardy	Rachel	15.0000	Hourly	Part Time	2,828.57
173	Hardy	Susan	14.0000	Hourly	Full Time	4,816.00
174	Harris	Elijah	14.0000	Hourly	Full Time	4,816.00
175	Harris	Felicia	14.0000	Hourly	Full Time	4,816.00
176	Harris	Micala N.	14.0000	Hourly	Full Time	4,816.00
177	Harris	Trinity	14.0000	Hourly	Part Time	3,600.00
178	Hart	Adam	14.0000	Hourly	Full Time	4,816.00
179	Hatfield	Chelsea	14.0000	Hourly	Part Time	2,280.00
180	Hayden	Danielle N.	16.0000	Hourly	Full Time	5,504.00
181	Hayes	Whitney	14.0000	Hourly	Full Time	4,816.00
182	Hays	Alyssa M.	14.0000	Hourly	Full Time	4,816.00
183	Hearn	Noah C.	20.0000	Hourly	Full Time	6,880.00
184	Heimrich	Jea'Anna C.	22.5962	Salaried	Full Time	7,747.23
185	Henke	Abbigail S.	14.0000	Hourly	Part Time	2,760.00
186	Henry	Michelle D.	14.0000	Hourly	Part Time	2,220.00
187	Henson	Myesha	14.0000	Hourly	Full Time	4,816.00
188	Herbert	Porscha N.	15.0000	Hourly	Full Time	5,160.00
189	Hernandez	Jasmine	14.0000	Hourly	Full Time	4,816.00
190	Hernandez	Marque E.	48.0769	Salaried	Full Time	16,483.46
191	Herrera	Christian A.	14.0000	Hourly	Full Time	4,816.00
192	Herring	Tytianna	14.0000	Hourly	Full Time	4,816.00
193	Hesterman	Alyssa B.	15.0000	Hourly	Full Time	5,160.00
194	Hicks	Natalia L.	14.0000	Hourly	Full Time	4,816.00
195	Hill	Jameka	14.0000	Hourly	Full Time	4,816.00
196	Hinkforth	Justin	14.0000	Hourly	Full Time	4,816.00
197	Hite	Kristopher C.	14.2500	Hourly	Full Time	4,902.00
198	Holmes	Lindsay M.	20.1923	Salaried	Full Time	6,923.05
199	Holtzberger	Chantel R.	16.0000	Hourly	Full Time	5,504.00
200	Homer	Kaley R.	14.0000	Hourly	Full Time	4,816.00
201	Horne	Nyesha	14.0000	Hourly	Full Time	4,816.00
202	Howard	Kyle	14.0000	Hourly	Full Time	4,816.00
203	Howell	Zoey M.	14.0000	Hourly	Full Time	4,816.00
204	Huber	Eliseo	14.0000	Hourly	Full Time	4,816.00
205	Huerta	Alina A.	15.0000	Hourly	Full Time	5,160.00
206	Hughes	Darmeika G.	23.5550	Salaried	Full Time	8,075.97
207	Hutchison	Shanika	14.0000	Hourly	Part Time	3,600.00
208	Ingram	Radiance	14.0000	Hourly	Part Time	3,060.00
209	Inniss	Aidien	14.0000	Hourly	Full Time	4,816.00
210	Jackson	Chasity L.	16.5000	Hourly	Full Time	5,676.00
211	Jackson	Isaac	14.0000	Hourly	Full Time	4,816.00
212	Jackson	Keenan	14.0000	Hourly	Full Time	4,816.00
213	James	VaNiyah	14.0000	Hourly	Full Time	4,816.00
214	Jenkins	Rachelle	15.0000	Hourly	Part Time	2,057.14
215	Jenkins	Ragean J.	15.0000	Hourly	Part Time	2,828.57
216	Johnson	Angela K.	14.0000	Hourly	Full Time	4,816.00
217	Johnson	Cassie N.	18.2692	Salaried	Full Time	6,263.72
218	Johnson	Chelsea L.	14.0000	Hourly	Full Time	4,816.00
219	Johnson	Denise D.	20.1923	Salaried	Full Time	6,923.05
220	Johnson	Lakesha	14.0000	Hourly	Part Time	4,020.00

	Last Name	First Name	Hourly Rate	Salary/Hourly	Full/Part Time	WARN Wage Damages
221	Johnson	Zandra	14.0000	Hourly	Full Time	4,816.00
222	Jones	Sierra R.	14.0000	Hourly	Full Time	4,816.00
223	Jones	Telisha	14.0000	Hourly	Full Time	4,816.00
224	Joniaux	Brittany	14.0000	Hourly	Full Time	4,816.00
225	Joseph	Christopher	14.0000	Hourly	Full Time	4,816.00
226	Joyner	Margarita	14.0000	Hourly	Full Time	4,816.00
227	Kalu	Angel	14.0000	Hourly	Full Time	4,816.00
228	Keeran	Jessica M.	18.1500	Hourly	Full Time	6,243.60
229	Kemp	Symphony L.	14.0000	Hourly	Full Time	4,816.00
230	Kendrick III	John L.	14.0000	Hourly	Part Time	2,580.00
231	Kennedy	Alyssa	15.0000	Hourly	Full Time	5,160.00
232	Kilbourn	Victoria	14.0000	Hourly	Full Time	4,816.00
233	Kindilien	Michele L.	17.3077	Hourly	Full Time	5,953.85
234	King	Jantel	14.0000	Hourly	Part Time	2,640.00
235	King	Mysha K.	14.0000	Hourly	Full Time	4,816.00
236	King	Ricardo A.	120.1923	Salaried	Full Time	41,208.65
237	Kirksey	Michael	14.0000	Hourly	Full Time	4,816.00
238	Kirksey	Tierra	14.0000	Hourly	Full Time	4,816.00
239	Kosovich	Kenneth R.	21.6346	Salaried	Full Time	7,417.56
240	Krill	Britny M.	14.0000	Hourly	Full Time	4,816.00
241	Kulczyk	Caitlin	14.0000	Hourly	Full Time	4,816.00
242	LaBelle	Jessica	14.0000	Hourly	Part Time	2,460.00
243	Lacy	Christina L.	18.4200	Salaried	Full Time	6,315.41
244	Laform	Ashton B.	14.0000	Hourly	Full Time	4,816.00
245	Laverde	Nathalia	14.0000	Hourly	Part Time	2,700.00
246	Leatch-Williams	Gay Y.	14.0000	Hourly	Full Time	4,816.00
247	Leininger	Theresa K.	14.0000	Hourly	Full Time	4,816.00
248	Limon	Justene	14.0000	Hourly	Part Time	1,620.00
249	Link	Amber Jo R.	18.2692	Salaried	Full Time	6,263.72
250	Logan	Colonda	14.0000	Hourly	Part Time	2,400.00
251	Lora	Anushka	15.0000	Hourly	Full Time	5,160.00
252	Lubin	Duvivier	14.0000	Hourly	Full Time	4,816.00
253	Lynott	Paula A.	16.0000	Hourly	Full Time	5,504.00
254	Madewell	Marisa	14.0000	Hourly	Part Time	1,500.00
255	Magazine	Aque	14.2500	Hourly	Full Time	4,902.00
256	Maiden	Reanna	14.0000	Hourly	Full Time	4,816.00
257	Malinasky	Taylor	14.0000	Hourly	Full Time	4,816.00
258	Marchese	Giuliana	14.0000	Hourly	Full Time	4,816.00
259	Martin	Kyla	14.0000	Hourly	Full Time	4,816.00
260	Mcardell	Macknicha	14.0000	Hourly	Full Time	4,816.00
261	McCarter	Bekah L.	14.0000	Hourly	Full Time	4,816.00
262	McFarland	Constance	14.0000	Hourly	Full Time	4,816.00
263	Mendez	Olivia J.	19.0000	Hourly	Full Time	6,536.00
264	Mendoza	Angela N.	12.0000	Hourly	Full Time	4,128.00
265	Meneese	Alana	14.0000	Hourly	Full Time	4,816.00
266	Metcalf	James W.	33.6538	Salaried	Full Time	11,538.42
267	Miller	Destiny	14.0000	Hourly	Full Time	4,816.00
268	Miller	Julie W.	14.0000	Hourly	Full Time	4,816.00
269	Miller	Kelly J.	18.8000	Hourly	Part Time	2,578.29
270	Miller (Cadle)	Angel M.	16.0000	Hourly	Full Time	5,504.00
271	Minor	Prisilla	14.0000	Hourly	Part Time	3,060.00
272	Mitchell	Amber M.	16.0000	Hourly	Full Time	5,504.00
273	Mitchell Sr.	Jalil K.	14.0000	Hourly	Full Time	4,816.00
274	Moats	Noah W.	14.0000	Hourly	Full Time	4,816.00
275	Mobley	Florence	14.0000	Hourly	Full Time	4,816.00

	Last Name	First Name	Hourly Rate	Salary/Hourly	Full/Part Time	WARN Wage Damages
276	Mohamed	Mohamed	14.0000	Hourly	Part Time	4,800.00
277	Montes	Elizabeth S.	17.7300	Hourly	Full Time	6,099.12
278	Moore	Erica	14.0000	Hourly	Full Time	4,816.00
279	Moore Jr.	Jamal	14.0000	Hourly	Full Time	4,816.00
280	Morris	LaKeya M.	15.0000	Hourly	Part Time	2,828.57
281	Morrison	Stacy B.	27.4038	Salaried	Full Time	9,395.57
282	Mower	Jennifer L.	14.0000	Hourly	Full Time	4,816.00
283	Moyer	Christen N.	14.0000	Hourly	Full Time	4,816.00
284	Mozo	Doricela N.	16.0000	Hourly	Full Time	5,504.00
285	Mucherson	Destiney M.	14.0000	Hourly	Full Time	4,816.00
286	Mueller	Amber	14.0000	Hourly	Part Time	2,460.00
287	Mueller	Jeffery	14.0000	Hourly	Full Time	4,816.00
288	Murray	Amanda L.	19.0100	Hourly	Full Time	6,539.44
289	Nails	Temerria L.	14.0000	Hourly	Full Time	4,816.00
290	Nash	Tamaresha	14.0000	Hourly	Full Time	4,816.00
291	Neuenschwander	Britzi M.	14.0000	Hourly	Part Time	2,160.00
292	Newsome	Troyan S.	14.0000	Hourly	Part Time	3,060.00
293	Nicholas	Arielle N.	14.0000	Hourly	Full Time	4,816.00
294	Nichols	Holland T.	28.0000	Salaried	Full Time	9,599.97
295	Noel	Emily R.	20.2100	Hourly	Full Time	6,952.24
296	Noriega	Heidy	15.0000	Hourly	Part Time	2,828.57
297	Obee	Malik	14.0000	Hourly	Full Time	4,816.00
298	Ohren	Joshua F.	18.4200	Hourly	Full Time	6,336.48
299	O'Leary	Kayla R.	19.0000	Hourly	Full Time	6,536.00
300	O'Neal	Tavares	14.0000	Hourly	Full Time	4,816.00
301	Osborne	Jared Z.	21.6300	Hourly	Full Time	7,440.72
302	Owens	Alexis	14.0000	Hourly	Full Time	4,816.00
303	Owens	Shayne J.	15.0000	Hourly	Part Time	2,828.57
304	Owensby	Jade	15.0000	Hourly	Full Time	5,160.00
305	Pagan	Crismari	14.0000	Hourly	Full Time	4,816.00
306	Pagan	Sydni	14.0000	Hourly	Full Time	4,816.00
307	Pang	Chiwah	15.0000	Hourly	Full Time	5,160.00
308	Parker	Collin A.	18.2692	Salaried	Full Time	6,263.72
309	Patterson	Domynique	14.0000	Hourly	Full Time	4,816.00
310	Payne	Clayton	14.0000	Hourly	Full Time	4,816.00
311	Payne	Kenneth	14.0000	Hourly	Full Time	4,816.00
312	PeeHolder	Rose	15.0000	Hourly	Full Time	5,160.00
313	Peete	Bria	14.0000	Hourly	Full Time	4,816.00
314	Pena	Kiara	14.0000	Hourly	Part Time	2,400.00
315	Peterson (LaChance)	Meagan L.	17.7600	Hourly	Full Time	6,109.44
316	Petrichor	Nicholas E.	14.0000	Hourly	Full Time	4,816.00
317	Pickens	Gail L.	14.0000	Hourly	Full Time	4,816.00
318	Pickett	Porchia L.	14.0000	Hourly	Full Time	4,816.00
319	Pierre	Mydine B.	14.0000	Hourly	Part Time	2,520.00
320	Pirzada	Fariha	14.0000	Hourly	Full Time	4,816.00
321	Powell	Whitney A.	14.0000	Hourly	Full Time	4,816.00
322	Prado	Alexandra N.	16.0000	Hourly	Full Time	5,504.00
323	Price	Jahneel	14.0000	Hourly	Full Time	4,816.00
324	Primeau	Matthew T.	14.0000	Hourly	Full Time	4,816.00
325	Prymer	Andra L.	14.0000	Hourly	Full Time	4,816.00
326	Quigley	Jacob	14.0000	Hourly	Full Time	4,816.00
327	Ramsey	Elizabeth	14.0000	Hourly	Full Time	4,816.00
328	Reed	Deborah A.	16.0000	Hourly	Full Time	5,504.00
329	Reed	Mackie	15.0000	Hourly	Full Time	5,160.00
330	Reed (Gomes De Souza)	Stephannie L.	28.8462	Salaried	Full Time	9,890.08

	Last Name	First Name	Hourly Rate	Salary/Hourly	Full/Part Time	WARN Wage Damages
331	Reid	Shuntoria	15.0000	Hourly	Part Time	2,828.57
332	Reyna	April	15.0000	Hourly	Full Time	5,160.00
333	Reynolds	Jamie E.	14.0000	Hourly	Full Time	4,816.00
334	Richey	Loren	14.0000	Hourly	Part Time	3,060.00
335	Ridgway	Devin L.	24.0385	Salaried	Full Time	8,241.73
336	Rivas	Summer L.	15.0000	Hourly	Full Time	5,160.00
337	Rivera	Ivanjenny	15.0000	Hourly	Part Time	2,700.00
338	Roberts	Nickisha	14.0000	Hourly	Full Time	4,816.00
339	Robinson	Amanda T.	14.0000	Hourly	Full Time	4,816.00
340	Robinson	Daejah	14.0000	Hourly	Full Time	4,816.00
341	Rodriguez	Ciji	15.0000	Hourly	Full Time	5,160.00
342	Rogers	An'Dra E.	14.0000	Hourly	Part Time	2,760.00
343	Routson II	Christopher C.	14.0000	Hourly	Part Time	2,220.00
344	Royal	Kaige M.	25.0000	Hourly	Full Time	8,600.00
345	Sam	Brandon J.	14.0000	Hourly	Part Time	1,680.00
346	Sanchez	Ashley R.	15.0000	Hourly	Full Time	5,160.00
347	Sanchez-Alvarez	Melissa	14.0000	Hourly	Part Time	1,800.00
348	Santiago	Andializ	14.0000	Hourly	Full Time	4,816.00
349	Sasse	Kayla	14.0000	Hourly	Full Time	4,816.00
350	Savini	Commodius	15.0000	Hourly	Full Time	5,160.00
351	Savoy	Tanya	14.0000	Hourly	Full Time	4,816.00
352	Saxton	Trinity E.	14.0000	Hourly	Full Time	4,816.00
353	Scattergood	Jane E.	16.0000	Hourly	Full Time	5,504.00
354	Schatz	Melissa L.	21.6346	Salaried	Full Time	7,417.56
355	Schorling	Timothy S.	16.0000	Hourly	Full Time	5,504.00
356	Schumacher	Trinity	15.0000	Hourly	Full Time	5,160.00
357	Scott	Alyssa M.	14.0000	Hourly	Full Time	4,816.00
358	Seldon	Jakira	14.0000	Hourly	Full Time	4,816.00
359	Sello	April D.	14.0000	Hourly	Full Time	4,816.00
360	Senior	Yuleisi A.	14.0000	Hourly	Full Time	4,816.00
361	Sephus	Nyla M.	14.0000	Hourly	Full Time	4,816.00
362	Shabazz	Kalifa	15.0000	Hourly	Full Time	5,160.00
363	Shawoosh	Desiree N.	16.0000	Hourly	Full Time	5,504.00
364	Shenuski	Alina	15.0000	Hourly	Part Time	2,700.00
365	Shingleton	Julianne M.	14.0000	Hourly	Full Time	4,816.00
366	Shirley	Kaysonie	15.0000	Hourly	Full Time	5,160.00
367	Shook	Pamela S.	14.0000	Hourly	Full Time	4,816.00
368	Simmons	Alies	14.0000	Hourly	Full Time	4,816.00
369	Simpson	Mikalah	14.0000	Hourly	Full Time	4,816.00
370	Sims	Tyler G.	14.0000	Hourly	Full Time	4,816.00
371	Small	Ann M.	16.3900	Hourly	Full Time	5,638.16
372	Smith	Andrilei	15.0000	Hourly	Full Time	5,160.00
373	Smith	Britney	14.0000	Hourly	Full Time	4,816.00
374	Smith	Janecia S.	14.0000	Hourly	Full Time	4,816.00
375	Smith	Kierstin	14.0000	Hourly	Part Time	2,280.00
376	Smith	Sade L.	14.0000	Hourly	Part Time	2,520.00
377	Snider	Gage A.	24.0385	Hourly	Full Time	8,269.23
378	Sowers	Samantha R.	14.0000	Hourly	Full Time	4,816.00
379	Spalding Smith	Taylor	14.0000	Hourly	Full Time	4,816.00
380	Spotts	Jazmynique	14.0000	Hourly	Full Time	4,816.00
381	Stantz	Jessica D.	14.0000	Hourly	Full Time	4,816.00
382	Stantz	Kenyotta L.	19.2308	Salaried	Full Time	6,593.38
383	Stark	Kaylyn R.	24.0385	Salaried	Full Time	8,241.73
384	Starry	Michelle A.	23.0000	Salaried	Full Time	7,885.69
385	Stevens	Jennifer	14.0000	Hourly	Full Time	4,816.00

	Last Name	First Name	Hourly Rate	Salary/Hourly	Full/Part Time	WARN Wage Damages
386	Stewart	Jasmin	15.0000	Hourly	Full Time	5,160.00
387	Stewart	Shania	14.0000	Hourly	Full Time	4,816.00
388	Stewart	Tiffany	14.0000	Hourly	Full Time	4,816.00
389	Stokes	LaShara	14.0000	Hourly	Part Time	2,520.00
390	Stork	Caitlynn G.	19.1200	Hourly	Full Time	6,577.28
391	Stout	Leilani	14.0000	Hourly	Full Time	4,816.00
392	Stout	Shauna J.	20.0000	Hourly	Full Time	6,880.00
393	Strain	Tracey E.	14.7500	Hourly	Full Time	5,074.00
394	Strickland	Justice	18.2692	Salaried	Full Time	6,263.72
395	Sullivan	Danielle M.	31.2500	Salaried	Full Time	10,714.25
396	Sweinhagen	Kalee L.	14.0000	Hourly	Full Time	4,816.00
397	Tague	Brandon A.	14.0000	Hourly	Full Time	4,816.00
398	Taylor	Mya	14.0000	Hourly	Part Time	3,300.00
399	Tedrow	Amanda W.	14.0000	Hourly	Full Time	4,816.00
400	Temple	Tyler A.	14.0000	Hourly	Full Time	4,816.00
401	Tenego	Duriane	14.0000	Hourly	Full Time	4,816.00
402	Thomas	David L.	31.2500	Salaried	Full Time	10,714.25
403	Thomas	Khalile	14.0000	Hourly	Full Time	4,816.00
404	Thompson	Jamiah L.	14.0000	Hourly	Full Time	4,816.00
405	Thompson	Olivia	16.0000	Hourly	Full Time	5,504.00
406	Thornsberry	Rachael H.	17.5000	Hourly	Full Time	6,020.00
407	Tillman	Jacoria A.	14.0000	Hourly	Full Time	4,816.00
408	Tinney	Chana	14.0000	Hourly	Full Time	4,816.00
409	Toledo	Joseph G.	28.8462	Salaried	Full Time	9,890.08
410	Toth	Michael S.	14.0000	Hourly	Full Time	4,816.00
411	Tumey	Caron	14.0000	Hourly	Full Time	4,816.00
412	Turner	Kimberly M.	14.0000	Hourly	Full Time	4,816.00
413	Tyson	Krissy E.	14.0000	Hourly	Full Time	4,816.00
414	Upchurch	Lakesha	14.0000	Hourly	Full Time	4,816.00
415	Valdez	Jeremiah	14.0000	Hourly	Full Time	4,816.00
416	Valdiserri	Jay	14.0000	Hourly	Full Time	4,816.00
417	Van Curen	KayLyne R.	14.0000	Hourly	Full Time	4,816.00
418	Van Hook	Nathan J.	14.0000	Hourly	Full Time	4,816.00
419	Vandemark	Jessica L.	40.8654	Salaried	Full Time	14,010.94
420	Vaughan	Kelsey M.	14.0000	Hourly	Full Time	4,816.00
421	Vaughn	Paris	14.0000	Hourly	Full Time	4,816.00
422	Venable	Traniece	14.0000	Hourly	Full Time	4,816.00
423	Wann	Christopher	14.0000	Hourly	Full Time	4,816.00
424	Ward	Sarah	14.0000	Hourly	Part Time	2,040.00
425	Washington	Tyra	14.0000	Hourly	Full Time	4,816.00
426	Watson	Candice	14.0000	Hourly	Full Time	4,816.00
427	Watts	Eeliana M.	14.0000	Hourly	Full Time	4,816.00
428	Webb	Samantha C.	16.0000	Hourly	Full Time	5,504.00
429	Wells	Alanna	14.0000	Hourly	Full Time	4,816.00
430	Westbrook	Diamond	14.0000	Hourly	Full Time	4,816.00
431	Whaley	Jamillah C.	14.0000	Hourly	Full Time	4,816.00
432	Whaley	Jessica M.	14.0000	Hourly	Full Time	4,816.00
433	White	Mario	14.0000	Hourly	Full Time	4,816.00
434	Whitehead	Tenecia N.	14.0000	Hourly	Full Time	4,816.00
435	Wilkins	Amber M.	14.0000	Hourly	Full Time	4,816.00
436	Williams	Alonzo	14.0000	Hourly	Full Time	4,816.00
437	Williams	Darlene N.	15.3000	Hourly	Full Time	5,263.20
438	Williams	Lakeisha	14.0000	Hourly	Part Time	2,700.00
439	Williams	Lakendria	14.0000	Hourly	Full Time	4,816.00
440	Williams	Richard I.	14.0000	Hourly	Full Time	4,816.00

	Last Name	First Name	Hourly Rate	Salary/Hourly	Full/Part Time	WARN Wage Damages
441	Williams	Tamiesha L.	14.0000	Hourly	Full Time	4,816.00
442	Wilson	Brian C.	15.0000	Hourly	Full Time	5,160.00
443	Wilson	Jenna W.	20.1923	Salaried	Full Time	6,923.05
444	Wilson	Lacey	14.0000	Hourly	Full Time	4,816.00
445	Wilson	Patrice	14.0000	Hourly	Full Time	4,816.00
446	Wilson	Tashia M.	14.0000	Hourly	Full Time	4,816.00
447	Woodley	Lashonna	15.0000	Hourly	Full Time	5,160.00
448	Woods	Kanisha T.	16.0000	Hourly	Full Time	5,504.00
449	Woolley	Brendan	15.0000	Hourly	Full Time	5,160.00
450	Wright	Chanda C.	14.0000	Hourly	Full Time	4,816.00
451	Wright	Kemia	14.0000	Hourly	Full Time	4,816.00
452	Wright	Tiara	14.0000	Hourly	Part Time	2,520.00
453	Yoho	Tessa A.	14.0000	Hourly	Full Time	4,816.00
454	Youngker	Rachel M.	33.6538	Salaried	Full Time	11,538.42
455	Zendejas	Nehemiah P.	15.0000	Hourly	Full Time	5,160.00

2,403,667.98

EXHIBIT 2

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
WESTERN DIVISION

Theresa Leininger,
on behalf of herself and all others
similarly situated,

Plaintiff,

-vs-

Mammoth Tech Inc.,

Defendant.

Case No. 3:22 CV 394

ORDER APPROVING RENEWED
REQUEST FOR DEFAULT JUDGMENT
FOLLOWING CLASS CERTIFICATION

JUDGE JACK ZOUHARY

Before this Court is the renewed Motion (Doc. 16) by Theresa Leininger (“Plaintiff” or “Class Representative”) on behalf of herself and on behalf of the certified class of similarly situated former employees she represents (the “Class”) for default judgment and quantification of damages against Defendant Mammoth Tech, Inc. (“Defendant”) pursuant to Federal Civil Rule 55, on the grounds that Defendant failed to answer Plaintiff’s Complaint and has failed to appear or otherwise defend this action. The relief sought in Plaintiff’s renewed Motion, adequately supported, provides sufficient evidence to reasonably demonstrate the amount of the Class WARN Act wages owed under 29 U.S.C. § 2104(a)(1)(A).

On March 11, 2022, Plaintiff filed the above captioned litigation (the “WARN Litigation”) on behalf of herself and on behalf of all similarly situated former employees against Defendant to recover sixty (60) days’ pay and benefits under the Worker Adjustment and Retraining Notification (WARN) Act of 1988 (29 U.S.C. §§ 2101 - 2109) (Doc. 1).

Defendant was served pursuant to Federal Civil Rule 4(e) with the Summons and Complaint via certified mail at 1250 Geneva Boulevard, Defiance, OH 43512 (Defendant's business address listed with the State of Ohio) on March 19, 2022. Given the date of service, response was due on April 11, 2022. Defendant failed to respond.

In the WARN Litigation, Plaintiff alleges that she, along with nearly five hundred other similarly situated former employees (the "Other Similarly Situated Former Employees"), suffered an employment loss, without cause on their part, as a result of the plant closing ordered by Defendant at its facility located in Defiance, OH (the "Facility") on or about March 2, 2022. Plaintiff further alleges that, prior to their terminations, neither Plaintiff nor the Other Similarly Situated Former Employees received written notice that complied with the requirements of the WARN Act.

The WARN Act requires, in general, that an employer give sixty days' advance written notice to affected employees before ordering a mass layoff or plant closing. *See* 29 U.S.C. § 2102. *See also Calloway v. Caraco Pharm. Labs., Ltd.*, 800 F.3d 244, 251 (6th Cir. 2015) ("The WARN Act requires employers to give a 60-day notice to affected employees before a plant closing or mass layoff."). The goal of the WARN Act is to "give workers and their families some transition time to adjust to the prospective loss of employment, to seek and obtain alternative jobs and, if necessary, to enter skill training or retraining that will allow these workers to successfully compete in the job market." *Calloway*, 800 F.3d at 251, (*quoting* 20 C.F.R. § 639.1(a)). The notice must be given by a method that is reasonably designed to ensure "receipt of notice at least 60 days before separation." 20 C.F.R. § 639.8.

The general rule under the WARN Act is that notice must be given sixty days in advance, 29 U.S.C. § 2102(a); and if notice is not given, then the employer is liable for back pay to each

aggrieved employee for “each day of the violation,” 29 U.S.C. § 2104(a). Courts have consistently held that an employer that does not comply with the WARN Act’s statutory notice mandate is barred from relying on any WARN statutory defenses as a matter of law and is liable for the full sixty days’ wages and benefits for each affected employee. *See, e.g., In re Quantegy, Inc.*, 343 B.R. 689, 695–96 (Bankr. D. Ala. 2006); *In re Tweeter Opco, Inc.*, 453 B.R. 534, 546–47 (Bankr. D. Del. 2011); *Organogenesis*, 331 B.R. 500 (D. Mass. 2005).

On July 14, 2022, Plaintiff applied for entry of default (Doc. 5) and also filed a Motion for default judgment, setting limited discovery and a hearing on damages (Doc. 6).

On July 15, 2022, the Clerk entered a default against Defendant (Doc. 7).

On August 16, 2022, this Court entered a notice of hearing on Plaintiffs’ Motion for default. The hearing was set for September 9, 2022.

On September 6, 2022, Plaintiff’s counsel filed a declaration in support of default judgment and damages (Doc. 8).

On September 9, 2022, this Court expressed concerns that a class had not been certified and later entered an Order granting Plaintiff leave to file supplemental materials by October 10, 2022.

Plaintiff then filed a motion to extend the time period to submit supplemental materials through and including October 20, 2022 (Doc. 13). This motion was granted on October 11, 2022.

On October 20, 2022, Plaintiff filed a motion for class certification (Doc. 14). The WARN Act allows a person seeking to enforce WARN liability to sue on behalf of other persons similarly situated. 29 U.S.C. § 2104(a)(5).

On November 1, 2022, this Court held a hearing on the motion for class certification. During the hearing, this Court signaled the motion for class certification should be granted.

On November 3, 2022, this Court entered an Order certifying a class pursuant to Federal Civil Rule 23 comprised of all former employees of Defendant who worked at, or reported to, or were assigned work from the facility located at 1250 Geneva Boulevard, Defiance, OH 43512 (the “Facility”) and were terminated, without cause on their part, on or about March 2, 2022 and thereafter, who do not file a timely request to opt-out of the class (the “Class”); (b) appointing Plaintiff as Class Representative; (c) appointing The Gardner Firm, P.C., Lankenau & Miller, LLP and Brennan, Manna & Diamond, LLC as Class Counsel; (d) approving the form and manner of Notice to the Class. (Doc. 15)

Notice to the class was to be mailed within ten days of entry of the Order and any Class members who wished to opt-out were to complete and submit an opt-out form (included with the Class Notice) no later than thirty-five days after the date of mailing. All requests for exclusion received after that date would not be effective, and any person who sent a late request would be a member of the Class and would be bound in the same way and to the same extent as all other Class Members. (Id.)

As shown in the Declaration of Class Counsel (Doc. 16-1), this Court-approved Class Notice was mailed to the Class members on November 11, 2022 and contained an opt-out deadline of December 16, 2022. Only one Class member (Mackenzie R. Monteith) chose to exclude by submitting a timely opt-out form to Class Counsel.

On December 20, 2022, this Court entered an Order denying the motion for default without prejudice and permitting Plaintiff to renew the damages request following establishment of Class membership.

On March 1, 2023, Plaintiff filed a renewed motion for default, with supporting evidence, following class certification (Doc. 16).

In the renewed motion, Plaintiff seeks WARN Act pay for herself and each of the Class members, as reflected on the Class spreadsheet (Doc. 16-3). Plaintiff's renewed request for damages reasonably demonstrates that the Class WARN Act wages owed under 29 U.S.C. § 2104(a)(1)(A) of the WARN Act are, in the aggregate, Two Million Four Hundred Three Thousand Six Hundred Sixty-Seven Dollars and Ninety-Eight Cents (\$2,403,667.98) (*see* Doc. 16-3).

Accordingly, this Court awards, and judgment is entered, in favor of the Plaintiff Class in the aggregate amount of Two Million Four Hundred Three Thousand Six Hundred Sixty-Seven Dollars and Ninety-Eight Cents (\$2,403,667.98).

IT IS SO ORDERED.

s/ Jack Zouhary
JACK ZOUHARY
U. S. DISTRICT JUDGE

March 29, 2023

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF OHIO**

In re: MAMMOTH TECH, INC. Alleged Debtor	Case No.
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**DECLARATION IN SUPPORT OF
AN INVOLUNTARY PETITION AGAINST MAMMOTH TECH, INC.**

1. I, Shawand Ebanks, am a former employee of Mammoth Tech, Inc (“Alleged Debtor” or “Defendant”). I worked at the Alleged Debtor’s facility located at 1250 Geneva Boulevard, Defiance, OH (the “Facility”) until the Alleged Debtor terminated me on or about March 2, 2022, along with hundreds of other employees who worked at, or reported to, or were assigned work from the Facility, without cause on our part as a result of the shutdown of Alleged Debtor’s business (“Similarly Situated Employees”).

2. I currently reside in Germantown, MD.

3. On March 11, 2022, Theresa Leininger filed a class action complaint in the United States District Court for the Northern District of Ohio (the “WARN Litigation”) on behalf of herself and on behalf of all similarly situated former employees against Alleged Debtor to recover sixty (60) days’ pay and benefits under the Worker Adjustment and Retraining Notification (WARN) Act of 1988 (29 U.S.C. §§ 2101 - 2109). Case No.: 3:22-cv-00394-JZ.

4. The Alleged Debtor failed to answer the complaint and has failed to appear or otherwise defend the WARN Litigation.

5. On November 3, 2022, the Court entered an Order certifying a class pursuant to Fed. R. Civ. P. 23 comprised of all former employees of Defendant who worked at, or reported to, or were assigned work from the facility located at 1250 Geneva Boulevard,

Defiance, OH 43512 and were terminated, without cause on their part, on or about March 2, 2022 and thereafter, who do not file a timely request to opt-out of the class (the “Class”); (b) appointing Plaintiff as Class Representative; (c) appointing The Gardner Firm, P.C., Lankenau & Miller, LLP and Brennan, Manna & Diamond, LLC as Class Counsel; (d) approving the form and manner of Notice to the Class. Notice to the class was to be mailed within ten days of entry of the Order and any Class members who wished to opt-out were to complete and submit the opt-out form (included with the Class Notice) so that it was received no later than thirty-five days after the date of mailing. All requests for exclusion received after that date would not be effective, and any person who sent a late request would be a member of the Class and would be bound in the same way and to the same extent as all other Class Members.

6. The Court-approved Class Notice was mailed to the Class Members on November 11, 2022 and contained an opt-out deadline of December 16, 2022. Only one Class member chose to exclude by submitting a timely opt-out form.

7. On March 1, 2023, Theresa Leininger filed a motion for default judgment seeking WARN Act wages under 29 U.S.C. §2104(a)(1)(A) “(the WARN Act”) in the aggregate of, Two Million Four Hundred Three Thousand Six Hundred Sixty-Seven Dollars and Ninety-Eight Cents (\$2,403,667.98) for herself and each of the Class Members as reflected on the attached Class Spreadsheet (Exhibit 1).

8. On March 29, 2023 the Court entered the attached judgment in favor of the Plaintiff Class in the aggregate amount of Two Million Four Hundred Three Thousand Six Hundred Sixty-Seven Dollars and Ninety-Eight Cents (\$2,403,667.98) (Exhibit 2).

9. As of December 5, 2023, there remains due the entire sum of \$2,403,667.98 by Mammoth Tech, Inc., none of which has been paid.

1. I personally hold an unsecured claim of \$4,816 owed by Mammoth Tech, Inc. as part of the judgment entered against Mammoth Tech. (See attached Exhibit 1).

2. I have signed an Involuntary Petition to evidence my joinder to the Petition.

3. The claim is unsecured, liquidated, noncontingent and is not subject to a bona fide dispute.

4. I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Executed on December⁰⁵, 2023

DocuSigned by:

Shawand Elank 12/5/2023

B366013589274F9...

By:

EXHIBIT 1

	Last Name	First Name	Hourly Rate	Salary/Hourly	Full/Part Time	WARN Wage Damages
1	Adedun	Doyin	14.0000	Hourly	Full Time	4,816.00
2	Agyei	Grace B.	14.0000	Hourly	Part Time	2,820.00
3	Akers	Elonda	14.0000	Hourly	Full Time	4,816.00
4	Anderson	Reslyn	14.0000	Hourly	Full Time	4,816.00
5	Anderson (Blair)	Chrisi A.	72.1154	Salaried	Full Time	24,725.19
6	Ankobia	Ma'at	14.0000	Hourly	Full Time	4,816.00
7	Anthony	Daniel R.	14.0000	Hourly	Part Time	2,460.00
8	Arif	Saiyeda B.	16.0000	Hourly	Full Time	5,504.00
9	Arreola	Miguel B.	14.0000	Hourly	Part Time	3,360.00
10	Arreola	Renee J.	32.6923	Salaried	Full Time	11,208.75
11	Aschliman	Sarah A.	14.0000	Hourly	Full Time	4,816.00
12	Athy	Ashly D.	14.7500	Hourly	Full Time	5,074.00
13	Atkinson	Dejon	15.0000	Hourly	Full Time	5,160.00
14	Avalos	Angel D.	15.0000	Hourly	Full Time	5,160.00
15	Avila	Kristy	15.0000	Hourly	Full Time	5,160.00
16	Baker	Danielle	14.0000	Hourly	Full Time	4,816.00
17	Barbato	Rachel	14.0000	Hourly	Full Time	4,816.00
18	Barker	Mary J.	14.0000	Hourly	Full Time	4,816.00
19	Barnette	Saeqwon	15.0000	Hourly	Part Time	2,828.57
20	Barnhart	Josiah	14.0000	Hourly	Part Time	2,640.00
21	Barrie	Salamatu	14.0000	Hourly	Part Time	2,400.00
22	Battle	Bria	14.0000	Hourly	Full Time	4,816.00
23	Battle	Khalid	14.0000	Hourly	Full Time	4,816.00
24	Baun	Christopher	14.0000	Hourly	Full Time	4,816.00
25	Baxter	Kobe W.	14.0000	Hourly	Part Time	3,840.00
26	Beader	Jessica	14.0000	Hourly	Full Time	4,816.00
27	Beard	Brittany	14.0000	Hourly	Full Time	4,816.00
28	Becker	Jasmine	14.0000	Hourly	Full Time	4,816.00
29	Belcher	Skyeler R.	18.2692	Salaried	Full Time	6,263.72
30	Bell	Cory	14.0000	Hourly	Part Time	3,000.00
31	Bell	Daphne	14.0000	Hourly	Full Time	4,816.00
32	Benitez	Briana	15.0000	Hourly	Full Time	5,160.00
33	Bernard	Sydney N.	14.0000	Hourly	Full Time	4,816.00
34	Berry	Ross M.	28.8461	Salaried	Full Time	9,890.06
35	Bethuy	Melanie	14.0000	Hourly	Full Time	4,816.00
36	Bird	Matthew	14.0000	Hourly	Full Time	4,816.00
37	Bird	Sara Ann E.	16.0000	Hourly	Full Time	5,504.00
38	Bishop	Teresa A.	14.0000	Hourly	Full Time	4,816.00
39	Blevins	Sarah	14.0000	Hourly	Part Time	2,100.00
40	Bloom	Amari	14.0000	Hourly	Full Time	4,816.00
41	Boas	Ian M.	15.0000	Hourly	Full Time	5,160.00
42	Bollett Sr.	Christopher S.	14.0000	Hourly	Full Time	4,816.00
43	Bonifas	Torey D.	35.4327	Salaried	Full Time	12,148.31
44	Boop	Jaide C.	14.0000	Hourly	Full Time	4,816.00
45	Bowen	Carrie V.	14.0000	Hourly	Full Time	4,816.00
46	Boyce	Nicole R.	16.0000	Hourly	Full Time	5,504.00
47	Branham	Danielle L.	24.0385	Salaried	Full Time	8,241.73
48	Branham	Kayla L.	14.7500	Hourly	Full Time	5,074.00
49	Brinkman	Mairi	15.0000	Hourly	Full Time	5,160.00
50	Brock	Brandon	14.0000	Hourly	Full Time	4,816.00
51	Brock	Samantha	14.0000	Hourly	Full Time	4,816.00
52	Brooks	Morissa L.	14.0000	Hourly	Full Time	4,816.00
53	Brooks	Shamya	14.0000	Hourly	Full Time	4,816.00
54	Brown	Brianna	15.0000	Hourly	Part Time	2,700.00
55	Brown	Phylena	15.0000	Hourly	Full Time	5,160.00

	Last Name	First Name	Hourly Rate	Salary/Hourly	Full/Part Time	WARN Wage Damages
56	Brown	Savannah	14.0000	Hourly	Full Time	4,816.00
57	Brown	Shanya	14.0000	Hourly	Full Time	4,816.00
58	Brown	Zakyela R.	15.0000	Hourly	Full Time	5,160.00
59	Bryan	Melissa J.	14.0000	Hourly	Full Time	4,816.00
60	Buford	Latoya	14.0000	Hourly	Full Time	4,816.00
61	Burke	Danielle	14.0000	Hourly	Full Time	4,816.00
62	Burton	Kenzel B.	14.0000	Hourly	Full Time	4,816.00
63	Butler	Amber	14.0000	Hourly	Full Time	4,816.00
64	Butler	Kelly T.	14.0000	Hourly	Full Time	4,816.00
65	Cage	Aaliyah M.	15.0000	Hourly	Full Time	5,160.00
66	Calcagno	Kayla	14.0000	Hourly	Part Time	2,880.00
67	Cannon	Kathryn L.	17.4200	Hourly	Full Time	5,992.48
68	Cannon	Shana	14.0000	Hourly	Full Time	4,816.00
69	Cantu	Karleigh A.	14.0000	Hourly	Full Time	4,816.00
70	Caraballo	Danny	15.0000	Hourly	Full Time	5,160.00
71	Caraballo	Sandra J.	15.0000	Hourly	Full Time	5,160.00
72	Carbonel	Dominique	15.0000	Hourly	Full Time	5,160.00
73	Carmona	Crystal	15.0000	Hourly	Full Time	5,160.00
74	Cashaw	Cameron	15.0000	Hourly	Part Time	2,635.71
75	Caywood	Briana	14.0000	Hourly	Full Time	4,816.00
76	Celestin	Kristen	14.0000	Hourly	Full Time	4,816.00
77	Celi	Michael	14.0000	Hourly	Full Time	4,816.00
78	Cerda	Jessica	15.0000	Hourly	Full Time	5,160.00
79	Chesebro	Tamara G.	26.4423	Hourly	Full Time	9,096.15
80	Chiles	Brittany L.	14.0000	Hourly	Full Time	4,816.00
81	Ciecierski	Kayla B.	14.0000	Hourly	Full Time	4,816.00
82	Clark	Shakira	14.0000	Hourly	Full Time	4,816.00
83	Clarke	Courtney J.	14.0000	Hourly	Full Time	4,816.00
84	Clarke	Shaniya	14.0000	Hourly	Full Time	4,816.00
85	Clay	Patrick T.	14.0000	Hourly	Full Time	4,816.00
86	Cobb	Alex M.	14.0000	Hourly	Full Time	4,816.00
87	Colbert	Alissa N.	14.0000	Hourly	Full Time	4,816.00
88	Condon	Laurie L.	18.4000	Hourly	Full Time	6,329.60
89	Connell	Terriann	15.0000	Hourly	Full Time	5,160.00
90	Conner	Albert	14.0000	Hourly	Part Time	2,280.00
91	Cooke	Maya	14.0000	Hourly	Full Time	4,816.00
92	Cooke	Mona	15.0000	Hourly	Part Time	2,828.57
93	Cooper	Jocile S.	14.0000	Hourly	Full Time	4,816.00
94	Cordes	Madeline M.	22.9558	Salaried	Full Time	7,870.52
95	Coressel	Jade N.	14.0000	Hourly	Full Time	4,816.00
96	Corley	Christina	15.0000	Hourly	Full Time	5,160.00
97	Costa	Chelsey M.	15.0000	Hourly	Full Time	5,160.00
98	Creekmore	Sherril	14.0000	Hourly	Full Time	4,816.00
99	Creer	Brennen J.	120.1923	Salaried	Full Time	41,208.65
100	Cunningham	Tenise	15.0000	Hourly	Full Time	5,160.00
101	Cutcher	Madysen	14.0000	Hourly	Full Time	4,816.00
102	Dangler	Erica L.	19.0000	Hourly	Full Time	6,536.00
103	Daniels	Arianna M.	14.0000	Hourly	Full Time	4,816.00
104	David	Samuel	14.0000	Hourly	Full Time	4,816.00
105	Day	Skyler J.	14.0000	Hourly	Full Time	4,816.00
106	Dean	Nicholas W.	40.8654	Salaried	Full Time	14,010.94
107	Deon-Jones	Carolyn	15.0000	Hourly	Full Time	5,160.00
108	Dey	Ashley	14.0000	Hourly	Full Time	4,816.00
109	Diallo	Abdoulaye	14.0000	Hourly	Full Time	4,816.00
110	Distasio	Penny	14.0000	Hourly	Full Time	4,816.00

	Last Name	First Name	Hourly Rate	Salary/Hourly	Full/Part Time	WARN Wage Damages
111	Dixon	Jazzmanyne	14.0000	Hourly	Full Time	4,816.00
112	Dixon	Vanessa	14.0000	Hourly	Part Time	4,800.00
113	Donald	Tanaiya	14.0000	Hourly	Full Time	4,816.00
114	Donaldson	James A.	15.0000	Hourly	Full Time	5,160.00
115	Douglas	Kulashawndrea I.	16.0000	Hourly	Full Time	5,504.00
116	Downard	Serina	14.0000	Hourly	Full Time	4,816.00
117	Drees	Isaac J.	18.2200	Hourly	Full Time	6,267.68
118	Dukes	Jennifer R.	26.9800	Hourly	Full Time	9,281.12
119	Dulyea	Jessica	14.0000	Hourly	Part Time	2,520.00
120	Duma	Lori J.	16.0000	Hourly	Full Time	5,504.00
121	Duncan II	Christopher	14.0000	Hourly	Full Time	4,816.00
122	Dunn	Lindsay	14.0000	Hourly	Full Time	4,816.00
123	Duran	Gloria Y.	15.0000	Hourly	Full Time	5,160.00
124	Durden	Ayana S.	14.0000	Hourly	Full Time	4,816.00
125	Earl	Sonya	15.0000	Hourly	Full Time	5,160.00
126	Eason	David P.	17.2788	Salaried	Full Time	5,924.16
127	Ebanks	Shawand S.	14.0000	Hourly	Full Time	4,816.00
128	Edwards	Kenzie M.	14.0000	Hourly	Full Time	4,816.00
129	Edwards	Peterson D.	14.0000	Hourly	Full Time	4,816.00
130	Edwards	Tytiana T.	14.0000	Hourly	Full Time	4,816.00
131	Elkins	Amy M.	20.4800	Hourly	Full Time	7,045.12
132	Escarment	Verlencia	15.0000	Hourly	Part Time	2,828.57
133	Espejo	Amelia R.	14.0000	Hourly	Full Time	4,816.00
134	Essex	Kaytlyn	14.0000	Hourly	Full Time	4,816.00
135	Ferrell	Tashya	14.0000	Hourly	Full Time	4,816.00
136	Fifer	Breanne C.	21.6346	Salaried	Full Time	7,417.56
137	Fishpaw	Austin A.	18.0000	Hourly	Full Time	6,192.00
138	Flanagan	Lorraine	14.0000	Hourly	Full Time	4,816.00
139	Flanary	Coralee D.	14.0000	Hourly	Full Time	4,816.00
140	Fleming	Rachel J.	28.8462	Salaried	Full Time	9,890.08
141	Fletcher	Cherish B.	14.0000	Hourly	Full Time	4,816.00
142	Flowers	Mesha D.	36.0577	Salaried	Full Time	12,362.60
143	Fortman	Sara	14.0000	Hourly	Full Time	4,816.00
144	Foxworth	Shaunte	14.0000	Hourly	Part Time	1,260.00
145	Francis	Sharmilla	15.0000	Hourly	Part Time	2,828.57
146	Francois	Kenyardi M.	14.0000	Hourly	Full Time	4,816.00
147	Franklin-Griffin	Kayla L.	16.8269	Salaried	Full Time	5,769.21
148	Frazier	Jasmine	15.0000	Hourly	Full Time	5,160.00
149	Fredrick	Melody R.	22.1154	Salaried	Full Time	7,582.39
150	Frost	Breanna	15.0000	Hourly	Full Time	5,160.00
151	Fuentes	Danielle N.	27.8800	Salaried	Full Time	9,558.83
152	Fuselier	Brian	14.0000	Hourly	Full Time	4,816.00
153	GARCIA	LATRINA	14.0000	Hourly	Full Time	4,816.00
154	Garrett	Quiana	15.0000	Hourly	Full Time	5,160.00
155	Garrett	Taquilla R.	15.0000	Hourly	Full Time	5,160.00
156	Gibbs	Shakira	14.0000	Hourly	Full Time	4,816.00
157	Gibbs	Shyenne	14.0000	Hourly	Full Time	4,816.00
158	Gilliard	Theodosha	14.0000	Hourly	Full Time	4,816.00
159	Gleeton	Tamara	14.0000	Hourly	Full Time	4,816.00
160	Gomez	Fernando J.	26.4423	Salaried	Full Time	9,065.90
161	Goodwyn	Quaaneiruh	14.2500	Hourly	Full Time	4,902.00
162	Graff	Brittnee	14.0000	Hourly	Part Time	2,460.00
163	Grant	Abigail	14.0000	Hourly	Full Time	4,816.00
164	Grant	Addi J.	20.0000	Hourly	Full Time	6,880.00
165	Green	Jada	14.0000	Hourly	Full Time	4,816.00

	Last Name	First Name	Hourly Rate	Salary/Hourly	Full/Part Time	WARN Wage Damages
166	Greene	Megan M.	24.0385	Hourly	Full Time	8,269.23
167	Green-Harris	Raven	14.0000	Hourly	Full Time	4,816.00
168	Griffin Jr.	Stephen L.	14.0000	Hourly	Full Time	4,816.00
169	Gullufsen	Krista	14.0000	Hourly	Part Time	3,120.00
170	Hannah	Faith L.	14.0000	Hourly	Full Time	4,816.00
171	Hanna-Martinez	Sophia T.	16.0000	Hourly	Full Time	5,504.00
172	Hardy	Rachel	15.0000	Hourly	Part Time	2,828.57
173	Hardy	Susan	14.0000	Hourly	Full Time	4,816.00
174	Harris	Elijah	14.0000	Hourly	Full Time	4,816.00
175	Harris	Felicia	14.0000	Hourly	Full Time	4,816.00
176	Harris	Micala N.	14.0000	Hourly	Full Time	4,816.00
177	Harris	Trinity	14.0000	Hourly	Part Time	3,600.00
178	Hart	Adam	14.0000	Hourly	Full Time	4,816.00
179	Hatfield	Chelsea	14.0000	Hourly	Part Time	2,280.00
180	Hayden	Danielle N.	16.0000	Hourly	Full Time	5,504.00
181	Hayes	Whitney	14.0000	Hourly	Full Time	4,816.00
182	Hays	Alyssa M.	14.0000	Hourly	Full Time	4,816.00
183	Hearn	Noah C.	20.0000	Hourly	Full Time	6,880.00
184	Heimrich	Jea'Anna C.	22.5962	Salaried	Full Time	7,747.23
185	Henke	Abbigail S.	14.0000	Hourly	Part Time	2,760.00
186	Henry	Michelle D.	14.0000	Hourly	Part Time	2,220.00
187	Henson	Myesha	14.0000	Hourly	Full Time	4,816.00
188	Herbert	Porscha N.	15.0000	Hourly	Full Time	5,160.00
189	Hernandez	Jasmine	14.0000	Hourly	Full Time	4,816.00
190	Hernandez	Marque E.	48.0769	Salaried	Full Time	16,483.46
191	Herrera	Christian A.	14.0000	Hourly	Full Time	4,816.00
192	Herring	Tytianna	14.0000	Hourly	Full Time	4,816.00
193	Hesterman	Alyssa B.	15.0000	Hourly	Full Time	5,160.00
194	Hicks	Natalia L.	14.0000	Hourly	Full Time	4,816.00
195	Hill	Jameka	14.0000	Hourly	Full Time	4,816.00
196	Hinkforth	Justin	14.0000	Hourly	Full Time	4,816.00
197	Hite	Kristopher C.	14.2500	Hourly	Full Time	4,902.00
198	Holmes	Lindsay M.	20.1923	Salaried	Full Time	6,923.05
199	Holtzberger	Chantel R.	16.0000	Hourly	Full Time	5,504.00
200	Homer	Kaley R.	14.0000	Hourly	Full Time	4,816.00
201	Horne	Nyesha	14.0000	Hourly	Full Time	4,816.00
202	Howard	Kyle	14.0000	Hourly	Full Time	4,816.00
203	Howell	Zoey M.	14.0000	Hourly	Full Time	4,816.00
204	Huber	Eliseo	14.0000	Hourly	Full Time	4,816.00
205	Huerta	Alina A.	15.0000	Hourly	Full Time	5,160.00
206	Hughes	Darmeika G.	23.5550	Salaried	Full Time	8,075.97
207	Hutchison	Shanika	14.0000	Hourly	Part Time	3,600.00
208	Ingram	Radiance	14.0000	Hourly	Part Time	3,060.00
209	Inniss	Aidien	14.0000	Hourly	Full Time	4,816.00
210	Jackson	Chasity L.	16.5000	Hourly	Full Time	5,676.00
211	Jackson	Isaac	14.0000	Hourly	Full Time	4,816.00
212	Jackson	Keenan	14.0000	Hourly	Full Time	4,816.00
213	James	VaNiyah	14.0000	Hourly	Full Time	4,816.00
214	Jenkins	Rachelle	15.0000	Hourly	Part Time	2,057.14
215	Jenkins	Ragean J.	15.0000	Hourly	Part Time	2,828.57
216	Johnson	Angela K.	14.0000	Hourly	Full Time	4,816.00
217	Johnson	Cassie N.	18.2692	Salaried	Full Time	6,263.72
218	Johnson	Chelsea L.	14.0000	Hourly	Full Time	4,816.00
219	Johnson	Denise D.	20.1923	Salaried	Full Time	6,923.05
220	Johnson	Lakesha	14.0000	Hourly	Part Time	4,020.00

	Last Name	First Name	Hourly Rate	Salary/Hourly	Full/Part Time	WARN Wage Damages
221	Johnson	Zandra	14.0000	Hourly	Full Time	4,816.00
222	Jones	Sierra R.	14.0000	Hourly	Full Time	4,816.00
223	Jones	Telisha	14.0000	Hourly	Full Time	4,816.00
224	Joniaux	Brittany	14.0000	Hourly	Full Time	4,816.00
225	Joseph	Christopher	14.0000	Hourly	Full Time	4,816.00
226	Joyner	Margarita	14.0000	Hourly	Full Time	4,816.00
227	Kalu	Angel	14.0000	Hourly	Full Time	4,816.00
228	Keeran	Jessica M.	18.1500	Hourly	Full Time	6,243.60
229	Kemp	Symphony L.	14.0000	Hourly	Full Time	4,816.00
230	Kendrick III	John L.	14.0000	Hourly	Part Time	2,580.00
231	Kennedy	Alyssa	15.0000	Hourly	Full Time	5,160.00
232	Kilbourn	Victoria	14.0000	Hourly	Full Time	4,816.00
233	Kindilien	Michele L.	17.3077	Hourly	Full Time	5,953.85
234	King	Jantel	14.0000	Hourly	Part Time	2,640.00
235	King	Mysha K.	14.0000	Hourly	Full Time	4,816.00
236	King	Ricardo A.	120.1923	Salaried	Full Time	41,208.65
237	Kirksey	Michael	14.0000	Hourly	Full Time	4,816.00
238	Kirksey	Tierra	14.0000	Hourly	Full Time	4,816.00
239	Kosovich	Kenneth R.	21.6346	Salaried	Full Time	7,417.56
240	Krill	Britny M.	14.0000	Hourly	Full Time	4,816.00
241	Kulczyk	Caitlin	14.0000	Hourly	Full Time	4,816.00
242	LaBelle	Jessica	14.0000	Hourly	Part Time	2,460.00
243	Lacy	Christina L.	18.4200	Salaried	Full Time	6,315.41
244	Laform	Ashton B.	14.0000	Hourly	Full Time	4,816.00
245	Laverde	Nathalia	14.0000	Hourly	Part Time	2,700.00
246	Leatch-Williams	Gay Y.	14.0000	Hourly	Full Time	4,816.00
247	Leiningner	Theresa K.	14.0000	Hourly	Full Time	4,816.00
248	Limon	Justene	14.0000	Hourly	Part Time	1,620.00
249	Link	Amber Jo R.	18.2692	Salaried	Full Time	6,263.72
250	Logan	Colonda	14.0000	Hourly	Part Time	2,400.00
251	Lora	Anushka	15.0000	Hourly	Full Time	5,160.00
252	Lubin	Duvivier	14.0000	Hourly	Full Time	4,816.00
253	Lynott	Paula A.	16.0000	Hourly	Full Time	5,504.00
254	Madewell	Marisa	14.0000	Hourly	Part Time	1,500.00
255	Magazine	Aque	14.2500	Hourly	Full Time	4,902.00
256	Maiden	Reanna	14.0000	Hourly	Full Time	4,816.00
257	Malinasky	Taylor	14.0000	Hourly	Full Time	4,816.00
258	Marchese	Giuliana	14.0000	Hourly	Full Time	4,816.00
259	Martin	Kyla	14.0000	Hourly	Full Time	4,816.00
260	Mccardell	Macknicha	14.0000	Hourly	Full Time	4,816.00
261	McCarter	Bekah L.	14.0000	Hourly	Full Time	4,816.00
262	McFarland	Constance	14.0000	Hourly	Full Time	4,816.00
263	Mendez	Olivia J.	19.0000	Hourly	Full Time	6,536.00
264	Mendoza	Angela N.	12.0000	Hourly	Full Time	4,128.00
265	Meneese	Alana	14.0000	Hourly	Full Time	4,816.00
266	Metcalf	James W.	33.6538	Salaried	Full Time	11,538.42
267	Miller	Destiny	14.0000	Hourly	Full Time	4,816.00
268	Miller	Julie W.	14.0000	Hourly	Full Time	4,816.00
269	Miller	Kelly J.	18.8000	Hourly	Part Time	2,578.29
270	Miller (Cadle)	Angel M.	16.0000	Hourly	Full Time	5,504.00
271	Minor	Prisilla	14.0000	Hourly	Part Time	3,060.00
272	Mitchell	Amber M.	16.0000	Hourly	Full Time	5,504.00
273	Mitchell Sr.	Jalil K.	14.0000	Hourly	Full Time	4,816.00
274	Moats	Noah W.	14.0000	Hourly	Full Time	4,816.00
275	Mobley	Florence	14.0000	Hourly	Full Time	4,816.00

	Last Name	First Name	Hourly Rate	Salary/Hourly	Full/Part Time	WARN Wage Damages
276	Mohamed	Mohamed	14.0000	Hourly	Part Time	4,800.00
277	Montes	Elizabeth S.	17.7300	Hourly	Full Time	6,099.12
278	Moore	Erica	14.0000	Hourly	Full Time	4,816.00
279	Moore Jr.	Jamal	14.0000	Hourly	Full Time	4,816.00
280	Morris	LaKeya M.	15.0000	Hourly	Part Time	2,828.57
281	Morrison	Stacy B.	27.4038	Salaried	Full Time	9,395.57
282	Mower	Jennifer L.	14.0000	Hourly	Full Time	4,816.00
283	Moyer	Christen N.	14.0000	Hourly	Full Time	4,816.00
284	Mozo	Doricela N.	16.0000	Hourly	Full Time	5,504.00
285	Mucherson	Destiney M.	14.0000	Hourly	Full Time	4,816.00
286	Mueller	Amber	14.0000	Hourly	Part Time	2,460.00
287	Mueller	Jeffery	14.0000	Hourly	Full Time	4,816.00
288	Murray	Amanda L.	19.0100	Hourly	Full Time	6,539.44
289	Nails	Temerria L.	14.0000	Hourly	Full Time	4,816.00
290	Nash	Tamaresha	14.0000	Hourly	Full Time	4,816.00
291	Neuenschwander	Britzi M.	14.0000	Hourly	Part Time	2,160.00
292	Newsome	Troyan S.	14.0000	Hourly	Part Time	3,060.00
293	Nicholas	Arielle N.	14.0000	Hourly	Full Time	4,816.00
294	Nichols	Holland T.	28.0000	Salaried	Full Time	9,599.97
295	Noel	Emily R.	20.2100	Hourly	Full Time	6,952.24
296	Noriega	Heidy	15.0000	Hourly	Part Time	2,828.57
297	Obee	Maliik	14.0000	Hourly	Full Time	4,816.00
298	Ohren	Joshua F.	18.4200	Hourly	Full Time	6,336.48
299	O'Leary	Kayla R.	19.0000	Hourly	Full Time	6,536.00
300	O'Neal	Tavares	14.0000	Hourly	Full Time	4,816.00
301	Osborne	Jared Z.	21.6300	Hourly	Full Time	7,440.72
302	Owens	Alexis	14.0000	Hourly	Full Time	4,816.00
303	Owens	Shayne J.	15.0000	Hourly	Part Time	2,828.57
304	Owensby	Jade	15.0000	Hourly	Full Time	5,160.00
305	Pagan	Crismari	14.0000	Hourly	Full Time	4,816.00
306	Pagan	Sydni	14.0000	Hourly	Full Time	4,816.00
307	Pang	Chiwah	15.0000	Hourly	Full Time	5,160.00
308	Parker	Collin A.	18.2692	Salaried	Full Time	6,263.72
309	Patterson	Domynique	14.0000	Hourly	Full Time	4,816.00
310	Payne	Clayton	14.0000	Hourly	Full Time	4,816.00
311	Payne	Kenneth	14.0000	Hourly	Full Time	4,816.00
312	PeeHolder	Rose	15.0000	Hourly	Full Time	5,160.00
313	Peete	Bria	14.0000	Hourly	Full Time	4,816.00
314	Pena	Kiara	14.0000	Hourly	Part Time	2,400.00
315	Peterson (LaChance)	Meagan L.	17.7600	Hourly	Full Time	6,109.44
316	Petrichor	Nicholas E.	14.0000	Hourly	Full Time	4,816.00
317	Pickens	Gail L.	14.0000	Hourly	Full Time	4,816.00
318	Pickett	Porchia L.	14.0000	Hourly	Full Time	4,816.00
319	Pierre	Mydine B.	14.0000	Hourly	Part Time	2,520.00
320	Pirzada	Fariha	14.0000	Hourly	Full Time	4,816.00
321	Powell	Whitney A.	14.0000	Hourly	Full Time	4,816.00
322	Prado	Alexandra N.	16.0000	Hourly	Full Time	5,504.00
323	Price	Jahneel	14.0000	Hourly	Full Time	4,816.00
324	Primeau	Matthew T.	14.0000	Hourly	Full Time	4,816.00
325	Prymer	Andra L.	14.0000	Hourly	Full Time	4,816.00
326	Quigley	Jacob	14.0000	Hourly	Full Time	4,816.00
327	Ramsey	Elizabeth	14.0000	Hourly	Full Time	4,816.00
328	Reed	Deborah A.	16.0000	Hourly	Full Time	5,504.00
329	Reed	Mackie	15.0000	Hourly	Full Time	5,160.00
330	Reed (Gomes De Souza)	Stephannie L.	28.8462	Salaried	Full Time	9,890.08

	Last Name	First Name	Hourly Rate	Salary/Hourly	Full/Part Time	WARN Wage Damages
331	Reid	Shuntoria	15.0000	Hourly	Part Time	2,828.57
332	Reyna	April	15.0000	Hourly	Full Time	5,160.00
333	Reynolds	Jamie E.	14.0000	Hourly	Full Time	4,816.00
334	Richey	Loren	14.0000	Hourly	Part Time	3,060.00
335	Ridgway	Devin L.	24.0385	Salaried	Full Time	8,241.73
336	Rivas	Summer L.	15.0000	Hourly	Full Time	5,160.00
337	Rivera	Ivanjenny	15.0000	Hourly	Part Time	2,700.00
338	Roberts	Nickisha	14.0000	Hourly	Full Time	4,816.00
339	Robinson	Amanda T.	14.0000	Hourly	Full Time	4,816.00
340	Robinson	Daejah	14.0000	Hourly	Full Time	4,816.00
341	Rodriguez	Ciji	15.0000	Hourly	Full Time	5,160.00
342	Rogers	An'Dra E.	14.0000	Hourly	Part Time	2,760.00
343	Routson II	Christopher C.	14.0000	Hourly	Part Time	2,220.00
344	Royal	Kaige M.	25.0000	Hourly	Full Time	8,600.00
345	Sam	Brandon J.	14.0000	Hourly	Part Time	1,680.00
346	Sanchez	Ashley R.	15.0000	Hourly	Full Time	5,160.00
347	Sanchez-Alvarez	Melissa	14.0000	Hourly	Part Time	1,800.00
348	Santiago	Andializ	14.0000	Hourly	Full Time	4,816.00
349	Sasse	Kayla	14.0000	Hourly	Full Time	4,816.00
350	Savini	Commodus	15.0000	Hourly	Full Time	5,160.00
351	Savoy	Tanya	14.0000	Hourly	Full Time	4,816.00
352	Saxton	Trinity E.	14.0000	Hourly	Full Time	4,816.00
353	Scattergood	Jane E.	16.0000	Hourly	Full Time	5,504.00
354	Schatz	Melissa L.	21.6346	Salaried	Full Time	7,417.56
355	Schorling	Timothy S.	16.0000	Hourly	Full Time	5,504.00
356	Schumacher	Trinity	15.0000	Hourly	Full Time	5,160.00
357	Scott	Alyssa M.	14.0000	Hourly	Full Time	4,816.00
358	Seldon	Jakira	14.0000	Hourly	Full Time	4,816.00
359	Sello	April D.	14.0000	Hourly	Full Time	4,816.00
360	Senior	Yuleisi A.	14.0000	Hourly	Full Time	4,816.00
361	Sephus	Nyla M.	14.0000	Hourly	Full Time	4,816.00
362	Shabazz	Kalifa	15.0000	Hourly	Full Time	5,160.00
363	Shawoosh	Desiree N.	16.0000	Hourly	Full Time	5,504.00
364	Shenuski	Alina	15.0000	Hourly	Part Time	2,700.00
365	Shingleton	Julianne M.	14.0000	Hourly	Full Time	4,816.00
366	Shirley	Kaysonie	15.0000	Hourly	Full Time	5,160.00
367	Shook	Pamela S.	14.0000	Hourly	Full Time	4,816.00
368	Simmons	Alies	14.0000	Hourly	Full Time	4,816.00
369	Simpson	Mikalalah	14.0000	Hourly	Full Time	4,816.00
370	Sims	Tyler G.	14.0000	Hourly	Full Time	4,816.00
371	Small	Ann M.	16.3900	Hourly	Full Time	5,638.16
372	Smith	Andrilei	15.0000	Hourly	Full Time	5,160.00
373	Smith	Britney	14.0000	Hourly	Full Time	4,816.00
374	Smith	Janecia S.	14.0000	Hourly	Full Time	4,816.00
375	Smith	Kierstin	14.0000	Hourly	Part Time	2,280.00
376	Smith	Sade L.	14.0000	Hourly	Part Time	2,520.00
377	Snider	Gage A.	24.0385	Hourly	Full Time	8,269.23
378	Sowers	Samantha R.	14.0000	Hourly	Full Time	4,816.00
379	Spalding Smith	Taylor	14.0000	Hourly	Full Time	4,816.00
380	Spotts	Jazmynique	14.0000	Hourly	Full Time	4,816.00
381	Stantz	Jessica D.	14.0000	Hourly	Full Time	4,816.00
382	Stantz	Kenyotta L.	19.2308	Salaried	Full Time	6,593.38
383	Stark	Kaylyn R.	24.0385	Salaried	Full Time	8,241.73
384	Starry	Michelle A.	23.0000	Salaried	Full Time	7,885.69
385	Stevens	Jennifer	14.0000	Hourly	Full Time	4,816.00

	Last Name	First Name	Hourly Rate	Salary/Hourly	Full/Part Time	WARN Wage Damages
386	Stewart	Jasmin	15.0000	Hourly	Full Time	5,160.00
387	Stewart	Shania	14.0000	Hourly	Full Time	4,816.00
388	Stewart	Tiffany	14.0000	Hourly	Full Time	4,816.00
389	Stokes	LaShara	14.0000	Hourly	Part Time	2,520.00
390	Stork	Caitlynn G.	19.1200	Hourly	Full Time	6,577.28
391	Stout	Leilani	14.0000	Hourly	Full Time	4,816.00
392	Stout	Shauna J.	20.0000	Hourly	Full Time	6,880.00
393	Strain	Tracey E.	14.7500	Hourly	Full Time	5,074.00
394	Strickland	Justice	18.2692	Salaried	Full Time	6,263.72
395	Sullivan	Danielle M.	31.2500	Salaried	Full Time	10,714.25
396	Sweinhagen	Kalee L.	14.0000	Hourly	Full Time	4,816.00
397	Tague	Brandon A.	14.0000	Hourly	Full Time	4,816.00
398	Taylor	Mya	14.0000	Hourly	Part Time	3,300.00
399	Tedrow	Amanda W.	14.0000	Hourly	Full Time	4,816.00
400	Temple	Tyler A.	14.0000	Hourly	Full Time	4,816.00
401	Tenego	Duriane	14.0000	Hourly	Full Time	4,816.00
402	Thomas	David L.	31.2500	Salaried	Full Time	10,714.25
403	Thomas	Khalile	14.0000	Hourly	Full Time	4,816.00
404	Thompson	Jamiah L.	14.0000	Hourly	Full Time	4,816.00
405	Thompson	Olivia	16.0000	Hourly	Full Time	5,504.00
406	Thornsberry	Rachael H.	17.5000	Hourly	Full Time	6,020.00
407	Tillman	Jacoria A.	14.0000	Hourly	Full Time	4,816.00
408	Tinney	Chana	14.0000	Hourly	Full Time	4,816.00
409	Toledo	Joseph G.	28.8462	Salaried	Full Time	9,890.08
410	Toth	Michael S.	14.0000	Hourly	Full Time	4,816.00
411	Tumey	Caron	14.0000	Hourly	Full Time	4,816.00
412	Turner	Kimberly M.	14.0000	Hourly	Full Time	4,816.00
413	Tyson	Krissy E.	14.0000	Hourly	Full Time	4,816.00
414	Upchurch	Lakesha	14.0000	Hourly	Full Time	4,816.00
415	Valdez	Jeremiah	14.0000	Hourly	Full Time	4,816.00
416	Valdiserri	Jay	14.0000	Hourly	Full Time	4,816.00
417	Van Curen	KayLyne R.	14.0000	Hourly	Full Time	4,816.00
418	Van Hook	Nathan J.	14.0000	Hourly	Full Time	4,816.00
419	Vandemark	Jessica L.	40.8654	Salaried	Full Time	14,010.94
420	Vaughan	Kelsey M.	14.0000	Hourly	Full Time	4,816.00
421	Vaughn	Paris	14.0000	Hourly	Full Time	4,816.00
422	Venable	Traniece	14.0000	Hourly	Full Time	4,816.00
423	Wann	Christopher	14.0000	Hourly	Full Time	4,816.00
424	Ward	Sarah	14.0000	Hourly	Part Time	2,040.00
425	Washington	Tyra	14.0000	Hourly	Full Time	4,816.00
426	Watson	Candice	14.0000	Hourly	Full Time	4,816.00
427	Watts	Eelliana M.	14.0000	Hourly	Full Time	4,816.00
428	Webb	Samantha C.	16.0000	Hourly	Full Time	5,504.00
429	Wells	Alanna	14.0000	Hourly	Full Time	4,816.00
430	Westbrook	Diamond	14.0000	Hourly	Full Time	4,816.00
431	Whaley	Jamillah C.	14.0000	Hourly	Full Time	4,816.00
432	Whaley	Jessica M.	14.0000	Hourly	Full Time	4,816.00
433	White	Mario	14.0000	Hourly	Full Time	4,816.00
434	Whitehead	Tenecia N.	14.0000	Hourly	Full Time	4,816.00
435	Wilkins	Amber M.	14.0000	Hourly	Full Time	4,816.00
436	Williams	Alonzo	14.0000	Hourly	Full Time	4,816.00
437	Williams	Darlene N.	15.3000	Hourly	Full Time	5,263.20
438	Williams	Lakeisha	14.0000	Hourly	Part Time	2,700.00
439	Williams	Lakendria	14.0000	Hourly	Full Time	4,816.00
440	Williams	Richard I.	14.0000	Hourly	Full Time	4,816.00

	Last Name	First Name	Hourly Rate	Salary/Hourly	Full/Part Time	WARN Wage Damages
441	Williams	Tamiesha L.	14.0000	Hourly	Full Time	4,816.00
442	Wilson	Brian C.	15.0000	Hourly	Full Time	5,160.00
443	Wilson	Jenna W.	20.1923	Salaried	Full Time	6,923.05
444	Wilson	Lacey	14.0000	Hourly	Full Time	4,816.00
445	Wilson	Patrice	14.0000	Hourly	Full Time	4,816.00
446	Wilson	Tashia M.	14.0000	Hourly	Full Time	4,816.00
447	Woodley	Lashonna	15.0000	Hourly	Full Time	5,160.00
448	Woods	Kanisha T.	16.0000	Hourly	Full Time	5,504.00
449	Woolley	Brendan	15.0000	Hourly	Full Time	5,160.00
450	Wright	Chanda C.	14.0000	Hourly	Full Time	4,816.00
451	Wright	Kemia	14.0000	Hourly	Full Time	4,816.00
452	Wright	Tiara	14.0000	Hourly	Part Time	2,520.00
453	Yoho	Tessa A.	14.0000	Hourly	Full Time	4,816.00
454	Youngker	Rachel M.	33.6538	Salaried	Full Time	11,538.42
455	Zendejas	Nehemiah P.	15.0000	Hourly	Full Time	5,160.00

2,403,667.98

EXHIBIT 2

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
WESTERN DIVISION

Theresa Leininger,
*on behalf of herself and all others
similarly situated,*

Plaintiff,

-vs-

Case No. 3:22 CV 394

ORDER APPROVING RENEWED
REQUEST FOR DEFAULT JUDGMENT
FOLLOWING CLASS CERTIFICATION

JUDGE JACK ZOUHARY

Mammoth Tech Inc.,

Defendant.

Before this Court is the renewed Motion (Doc. 16) by Theresa Leininger (“Plaintiff” or “Class Representative”) on behalf of herself and on behalf of the certified class of similarly situated former employees she represents (the “Class”) for default judgment and quantification of damages against Defendant Mammoth Tech, Inc. (“Defendant”) pursuant to Federal Civil Rule 55, on the grounds that Defendant failed to answer Plaintiff’s Complaint and has failed to appear or otherwise defend this action. The relief sought in Plaintiff’s renewed Motion, adequately supported, provides sufficient evidence to reasonably demonstrate the amount of the Class WARN Act wages owed under 29 U.S.C. § 2104(a)(1)(A).

On March 11, 2022, Plaintiff filed the above captioned litigation (the “WARN Litigation”) on behalf of herself and on behalf of all similarly situated former employees against Defendant to recover sixty (60) days’ pay and benefits under the Worker Adjustment and Retraining Notification (WARN) Act of 1988 (29 U.S.C. §§ 2101 - 2109) (Doc. 1).

Defendant was served pursuant to Federal Civil Rule 4(e) with the Summons and Complaint via certified mail at 1250 Geneva Boulevard, Defiance, OH 43512 (Defendant's business address listed with the State of Ohio) on March 19, 2022. Given the date of service, response was due on April 11, 2022. Defendant failed to respond.

In the WARN Litigation, Plaintiff alleges that she, along with nearly five hundred other similarly situated former employees (the "Other Similarly Situated Former Employees"), suffered an employment loss, without cause on their part, as a result of the plant closing ordered by Defendant at its facility located in Defiance, OH (the "Facility") on or about March 2, 2022. Plaintiff further alleges that, prior to their terminations, neither Plaintiff nor the Other Similarly Situated Former Employees received written notice that complied with the requirements of the WARN Act.

The WARN Act requires, in general, that an employer give sixty days' advance written notice to affected employees before ordering a mass layoff or plant closing. *See* 29 U.S.C. § 2102. *See also Calloway v. Caraco Pharm. Labs., Ltd.*, 800 F.3d 244, 251 (6th Cir. 2015) ("The WARN Act requires employers to give a 60-day notice to affected employees before a plant closing or mass layoff."). The goal of the WARN Act is to "give workers and their families some transition time to adjust to the prospective loss of employment, to seek and obtain alternative jobs and, if necessary, to enter skill training or retraining that will allow these workers to successfully compete in the job market." *Calloway*, 800 F.3d at 251, (*quoting* 20 C.F.R. § 639.1(a)). The notice must be given by a method that is reasonably designed to ensure "receipt of notice at least 60 days before separation." 20 C.F.R. § 639.8.

The general rule under the WARN Act is that notice must be given sixty days in advance, 29 U.S.C. § 2102(a); and if notice is not given, then the employer is liable for back pay to each

aggrieved employee for “each day of the violation,” 29 U.S.C. § 2104(a). Courts have consistently held that an employer that does not comply with the WARN Act’s statutory notice mandate is barred from relying on any WARN statutory defenses as a matter of law and is liable for the full sixty days’ wages and benefits for each affected employee. *See, e.g., In re Quantegy, Inc.*, 343 B.R. 689, 695–96 (Bankr. D. Ala. 2006); *In re Tweeter Opco, Inc.*, 453 B.R. 534, 546–47 (Bankr. D. Del. 2011); *Organogenesis*, 331 B.R. 500 (D. Mass. 2005).

On July 14, 2022, Plaintiff applied for entry of default (Doc. 5) and also filed a Motion for default judgment, setting limited discovery and a hearing on damages (Doc. 6).

On July 15, 2022, the Clerk entered a default against Defendant (Doc. 7).

On August 16, 2022, this Court entered a notice of hearing on Plaintiffs’ Motion for default. The hearing was set for September 9, 2022.

On September 6, 2022, Plaintiff’s counsel filed a declaration in support of default judgment and damages (Doc. 8).

On September 9, 2022, this Court expressed concerns that a class had not been certified and later entered an Order granting Plaintiff leave to file supplemental materials by October 10, 2022.

Plaintiff then filed a motion to extend the time period to submit supplemental materials through and including October 20, 2022 (Doc. 13). This motion was granted on October 11, 2022.

On October 20, 2022, Plaintiff filed a motion for class certification (Doc. 14). The WARN Act allows a person seeking to enforce WARN liability to sue on behalf of other persons similarly situated. 29 U.S.C. § 2104(a)(5).

On November 1, 2022, this Court held a hearing on the motion for class certification. During the hearing, this Court signaled the motion for class certification should be granted.

On November 3, 2022, this Court entered an Order certifying a class pursuant to Federal Civil Rule 23 comprised of all former employees of Defendant who worked at, or reported to, or were assigned work from the facility located at 1250 Geneva Boulevard, Defiance, OH 43512 (the “Facility”) and were terminated, without cause on their part, on or about March 2, 2022 and thereafter, who do not file a timely request to opt-out of the class (the “Class”); (b) appointing Plaintiff as Class Representative; (c) appointing The Gardner Firm, P.C., Lankenau & Miller, LLP and Brennan, Manna & Diamond, LLC as Class Counsel; (d) approving the form and manner of Notice to the Class. (Doc. 15)

Notice to the class was to be mailed within ten days of entry of the Order and any Class members who wished to opt-out were to complete and submit an opt-out form (included with the Class Notice) no later than thirty-five days after the date of mailing. All requests for exclusion received after that date would not be effective, and any person who sent a late request would be a member of the Class and would be bound in the same way and to the same extent as all other Class Members. (Id.)

As shown in the Declaration of Class Counsel (Doc. 16-1), this Court-approved Class Notice was mailed to the Class members on November 11, 2022 and contained an opt-out deadline of December 16, 2022. Only one Class member (Mackenzie R. Monteith) chose to exclude by submitting a timely opt-out form to Class Counsel.

On December 20, 2022, this Court entered an Order denying the motion for default without prejudice and permitting Plaintiff to renew the damages request following establishment of Class membership.

On March 1, 2023, Plaintiff filed a renewed motion for default, with supporting evidence, following class certification (Doc. 16).

In the renewed motion, Plaintiff seeks WARN Act pay for herself and each of the Class members, as reflected on the Class spreadsheet (Doc. 16-3). Plaintiff's renewed request for damages reasonably demonstrates that the Class WARN Act wages owed under 29 U.S.C. § 2104(a)(1)(A) of the WARN Act are, in the aggregate, Two Million Four Hundred Three Thousand Six Hundred Sixty-Seven Dollars and Ninety-Eight Cents (\$2,403,667.98) (*see* Doc. 16-3).

Accordingly, this Court awards, and judgment is entered, in favor of the Plaintiff Class in the aggregate amount of Two Million Four Hundred Three Thousand Six Hundred Sixty-Seven Dollars and Ninety-Eight Cents (\$2,403,667.98).

IT IS SO ORDERED.

s/ Jack Zouhary
JACK ZOUHARY
U. S. DISTRICT JUDGE

March 29, 2023

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF OHIO**

In re: MAMMOTH TECH, INC. Alleged Debtor	Case No.
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**DECLARATION IN SUPPORT OF
AN INVOLUNTARY PETITION AGAINST MAMMOTH TECH, INC.**

1. I, Theresa Leininger, am a former employee of Mammoth Tech, Inc (“Alleged Debtor” or “Defendant”). I worked at the Alleged Debtor’s facility located at 1250 Geneva Boulevard, Defiance, OH (the “Facility”) until the Alleged Debtor terminated me on or about March 2, 2022, along with hundreds of other employees who worked at, or reported to, or were assigned work from the Facility, without cause on our part as a result of the shutdown of Alleged Debtor’s business (“Similarly Situated Employees”).

2. I currently reside in Defiance, OH.

3. On March 11, 2022, I filed a class action complaint in the United States District Court for the Northern District of Ohio (the “WARN Litigation”) on behalf of myself and on behalf of all similarly situated former employees against Alleged Debtor to recover sixty (60) days’ pay and benefits under the Worker Adjustment and Retraining Notification (WARN) Act of 1988 (29 U.S.C. §§ 2101 - 2109). Case No.: 3:22-cv-00394-JZ.

4. The Alleged Debtor failed to answer the complaint and has failed to appear or otherwise defend the WARN Litigation.

5. On November 3, 2022, the Court entered an Order certifying a class pursuant to Fed. R. Civ. P. 23 comprised of all former employees of Defendant who worked at, or reported to, or were assigned work from the facility located at 1250 Geneva Boulevard,

Defiance, OH 43512 and were terminated, without cause on their part, on or about March 2, 2022 and thereafter, who do not file a timely request to opt-out of the class (the “Class”); (b) appointing Plaintiff as Class Representative; (c) appointing The Gardner Firm, P.C., Lankenau & Miller, LLP and Brennan, Manna & Diamond, LLC as Class Counsel; (d) approving the form and manner of Notice to the Class. Notice to the class was to be mailed within ten days of entry of the Order and any Class members who wished to opt-out were to complete and submit the opt-out form (included with the Class Notice) so that it was received no later than thirty-five days after the date of mailing. All requests for exclusion received after that date would not be effective, and any person who sent a late request would be a member of the Class and would be bound in the same way and to the same extent as all other Class Members.

6. The Court-approved Class Notice was mailed to the Class Members on November 11, 2022 and contained an opt-out deadline of December 16, 2022. Only one Class member chose to exclude by submitting a timely opt-out form.

7. On March 1, 2023, I filed a motion for default judgment seeking WARN Act wages under 29 U.S.C. §2104(a)(1)(A) “(the WARN Act”) in the aggregate of, Two Million Four Hundred Three Thousand Six Hundred Sixty-Seven Dollars and Ninety-Eight Cents (\$2,403,667.98) for myself and each of the Class Members as reflected on the attached Class Spreadsheet (Exhibit 1).

8. On March 29, 2023 the Court entered the attached judgment in favor of the Plaintiff Class in the aggregate amount of Two Million Four Hundred Three Thousand Six Hundred Sixty-Seven Dollars and Ninety-Eight Cents (\$2,403,667.98) (Exhibit 2).

9. As of April 26, 2023, there remains due the entire sum of \$2,403,667.98 by Mammoth Tech, Inc., none of which has been paid.

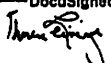
1. I personally hold an unsecured claim of \$4,816 owed by Mammoth Tech, Inc. as part of the judgment entered against Mammoth Tech. (See attached Exhibit 1).

2. I have signed an Involuntary Petition to evidence my joinder to the Petition.

3. The claim is unsecured, liquidated, noncontingent and is not subject to a bona fide dispute.

4. I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Executed on December⁶, 2023

DocuSigned by:

16390FE4CA14484...
By: _____

12/6/2023

EXHIBIT 1

	Last Name	First Name	Hourly Rate	Salary/Hourly	Full/Part Time	WARN Wage Damages
1	Adedun	Doyin	14.0000	Hourly	Full Time	4,816.00
2	Agyei	Grace B.	14.0000	Hourly	Part Time	2,820.00
3	Akers	Elonda	14.0000	Hourly	Full Time	4,816.00
4	Anderson	Reslyn	14.0000	Hourly	Full Time	4,816.00
5	Anderson (Blair)	Chrisi A.	72.1154	Salaried	Full Time	24,725.19
6	Ankobia	Ma'at	14.0000	Hourly	Full Time	4,816.00
7	Anthony	Daniel R.	14.0000	Hourly	Part Time	2,460.00
8	Arif	Saiyeda B.	16.0000	Hourly	Full Time	5,504.00
9	Arreola	Miguel B.	14.0000	Hourly	Part Time	3,360.00
10	Arreola	Renee J.	32.6923	Salaried	Full Time	11,208.75
11	Aschliman	Sarah A.	14.0000	Hourly	Full Time	4,816.00
12	Athy	Ashly D.	14.7500	Hourly	Full Time	5,074.00
13	Atkinson	Dejon	15.0000	Hourly	Full Time	5,160.00
14	Avalos	Angel D.	15.0000	Hourly	Full Time	5,160.00
15	Avila	Kristy	15.0000	Hourly	Full Time	5,160.00
16	Baker	Danielle	14.0000	Hourly	Full Time	4,816.00
17	Barbato	Rachel	14.0000	Hourly	Full Time	4,816.00
18	Barker	Mary J.	14.0000	Hourly	Full Time	4,816.00
19	Barnette	Saeqwon	15.0000	Hourly	Part Time	2,828.57
20	Barnhart	Josiah	14.0000	Hourly	Part Time	2,640.00
21	Barrie	Salamatu	14.0000	Hourly	Part Time	2,400.00
22	Battle	Bria	14.0000	Hourly	Full Time	4,816.00
23	Battle	Khalid	14.0000	Hourly	Full Time	4,816.00
24	Baun	Christopher	14.0000	Hourly	Full Time	4,816.00
25	Baxter	Kobe W.	14.0000	Hourly	Part Time	3,840.00
26	Beader	Jessica	14.0000	Hourly	Full Time	4,816.00
27	Beard	Brittany	14.0000	Hourly	Full Time	4,816.00
28	Becker	Jasmine	14.0000	Hourly	Full Time	4,816.00
29	Belcher	Skyeler R.	18.2692	Salaried	Full Time	6,263.72
30	Bell	Cory	14.0000	Hourly	Part Time	3,000.00
31	Bell	Daphne	14.0000	Hourly	Full Time	4,816.00
32	Benitez	Briana	15.0000	Hourly	Full Time	5,160.00
33	Bernard	Sydney N.	14.0000	Hourly	Full Time	4,816.00
34	Berry	Ross M.	28.8461	Salaried	Full Time	9,890.06
35	Bethuy	Melanie	14.0000	Hourly	Full Time	4,816.00
36	Bird	Matthew	14.0000	Hourly	Full Time	4,816.00
37	Bird	Sara Ann E.	16.0000	Hourly	Full Time	5,504.00
38	Bishop	Teresa A.	14.0000	Hourly	Full Time	4,816.00
39	Blevins	Sarah	14.0000	Hourly	Part Time	2,100.00
40	Bloom	Amari	14.0000	Hourly	Full Time	4,816.00
41	Boas	Ian M.	15.0000	Hourly	Full Time	5,160.00
42	Bollett Sr.	Christopher S.	14.0000	Hourly	Full Time	4,816.00
43	Bonifas	Torey D.	35.4327	Salaried	Full Time	12,148.31
44	Boop	Jaide C.	14.0000	Hourly	Full Time	4,816.00
45	Bowen	Carrie V.	14.0000	Hourly	Full Time	4,816.00
46	Boyce	Nicole R.	16.0000	Hourly	Full Time	5,504.00
47	Branham	Danielle L.	24.0385	Salaried	Full Time	8,241.73
48	Branham	Kayla L.	14.7500	Hourly	Full Time	5,074.00
49	Brinkman	Mairi	15.0000	Hourly	Full Time	5,160.00
50	Brock	Brandon	14.0000	Hourly	Full Time	4,816.00
51	Brock	Samantha	14.0000	Hourly	Full Time	4,816.00
52	Brooks	Morissa L.	14.0000	Hourly	Full Time	4,816.00
53	Brooks	Shamya	14.0000	Hourly	Full Time	4,816.00
54	Brown	Brianna	15.0000	Hourly	Part Time	2,700.00
55	Brown	Phylena	15.0000	Hourly	Full Time	5,160.00

	Last Name	First Name	Hourly Rate	Salary/Hourly	Full/Part Time	WARN Wage Damages
56	Brown	Savannah	14.0000	Hourly	Full Time	4,816.00
57	Brown	Shanya	14.0000	Hourly	Full Time	4,816.00
58	Brown	Zakyela R.	15.0000	Hourly	Full Time	5,160.00
59	Bryan	Melissa J.	14.0000	Hourly	Full Time	4,816.00
60	Buford	Latoya	14.0000	Hourly	Full Time	4,816.00
61	Burke	Danielle	14.0000	Hourly	Full Time	4,816.00
62	Burton	Kenzel B.	14.0000	Hourly	Full Time	4,816.00
63	Butler	Amber	14.0000	Hourly	Full Time	4,816.00
64	Butler	Kelly T.	14.0000	Hourly	Full Time	4,816.00
65	Cage	Aaliyah M.	15.0000	Hourly	Full Time	5,160.00
66	Calcagno	Kayla	14.0000	Hourly	Part Time	2,880.00
67	Cannon	Kathryn L.	17.4200	Hourly	Full Time	5,992.48
68	Cannon	Shana	14.0000	Hourly	Full Time	4,816.00
69	Cantu	Karleigh A.	14.0000	Hourly	Full Time	4,816.00
70	Caraballo	Danny	15.0000	Hourly	Full Time	5,160.00
71	Caraballo	Sandra J.	15.0000	Hourly	Full Time	5,160.00
72	Carbonel	Dominique	15.0000	Hourly	Full Time	5,160.00
73	Carmona	Crystal	15.0000	Hourly	Full Time	5,160.00
74	Cashaw	Cameron	15.0000	Hourly	Part Time	2,635.71
75	Caywood	Briana	14.0000	Hourly	Full Time	4,816.00
76	Celestin	Kristen	14.0000	Hourly	Full Time	4,816.00
77	Celi	Michael	14.0000	Hourly	Full Time	4,816.00
78	Cerda	Jessica	15.0000	Hourly	Full Time	5,160.00
79	Chesebro	Tamara G.	26.4423	Hourly	Full Time	9,096.15
80	Chiles	Brittany L.	14.0000	Hourly	Full Time	4,816.00
81	Ciecierski	Kayla B.	14.0000	Hourly	Full Time	4,816.00
82	Clark	Shakira	14.0000	Hourly	Full Time	4,816.00
83	Clarke	Courtney J.	14.0000	Hourly	Full Time	4,816.00
84	Clarke	Shaniya	14.0000	Hourly	Full Time	4,816.00
85	Clay	Patrick T.	14.0000	Hourly	Full Time	4,816.00
86	Cobb	Alex M.	14.0000	Hourly	Full Time	4,816.00
87	Colbert	Alissa N.	14.0000	Hourly	Full Time	4,816.00
88	Condon	Laurie L.	18.4000	Hourly	Full Time	6,329.60
89	Connell	Terriann	15.0000	Hourly	Full Time	5,160.00
90	Conner	Albert	14.0000	Hourly	Part Time	2,280.00
91	Cooke	Maya	14.0000	Hourly	Full Time	4,816.00
92	Cooke	Mona	15.0000	Hourly	Part Time	2,828.57
93	Cooper	Jocile S.	14.0000	Hourly	Full Time	4,816.00
94	Cordes	Madeline M.	22.9558	Salaried	Full Time	7,870.52
95	Coressel	Jade N.	14.0000	Hourly	Full Time	4,816.00
96	Corley	Christina	15.0000	Hourly	Full Time	5,160.00
97	Costa	Chelsey M.	15.0000	Hourly	Full Time	5,160.00
98	Creekmore	Sherril	14.0000	Hourly	Full Time	4,816.00
99	Creer	Brennen J.	120.1923	Salaried	Full Time	41,208.65
100	Cunningham	Tenise	15.0000	Hourly	Full Time	5,160.00
101	Cutcher	Madyson	14.0000	Hourly	Full Time	4,816.00
102	Dangler	Erica L.	19.0000	Hourly	Full Time	6,536.00
103	Daniels	Arianna M.	14.0000	Hourly	Full Time	4,816.00
104	David	Samuel	14.0000	Hourly	Full Time	4,816.00
105	Day	Skyler J.	14.0000	Hourly	Full Time	4,816.00
106	Dean	Nicholas W.	40.8654	Salaried	Full Time	14,010.94
107	Deon-Jones	Carolyn	15.0000	Hourly	Full Time	5,160.00
108	Dey	Ashley	14.0000	Hourly	Full Time	4,816.00
109	Diallo	Abdoulaye	14.0000	Hourly	Full Time	4,816.00
110	Distasio	Penny	14.0000	Hourly	Full Time	4,816.00

	Last Name	First Name	Hourly Rate	Salary/Hourly	Full/Part Time	WARN Wage Damages
111	Dixon	Jazzmanyne	14.0000	Hourly	Full Time	4,816.00
112	Dixon	Vanessa	14.0000	Hourly	Part Time	4,800.00
113	Donald	Tanaiya	14.0000	Hourly	Full Time	4,816.00
114	Donaldson	James A.	15.0000	Hourly	Full Time	5,160.00
115	Douglas	Kulashawndrea I.	16.0000	Hourly	Full Time	5,504.00
116	Downard	Serina	14.0000	Hourly	Full Time	4,816.00
117	Drees	Isaac J.	18.2200	Hourly	Full Time	6,267.68
118	Dukes	Jennifer R.	26.9800	Hourly	Full Time	9,281.12
119	Dulyea	Jessica	14.0000	Hourly	Part Time	2,520.00
120	Duma	Lori J.	16.0000	Hourly	Full Time	5,504.00
121	Duncan II	Christopher	14.0000	Hourly	Full Time	4,816.00
122	Dunn	Lindsay	14.0000	Hourly	Full Time	4,816.00
123	Duran	Gloria Y.	15.0000	Hourly	Full Time	5,160.00
124	Durden	Ayana S.	14.0000	Hourly	Full Time	4,816.00
125	Earl	Sonya	15.0000	Hourly	Full Time	5,160.00
126	Eason	David P.	17.2788	Salaried	Full Time	5,924.16
127	Ebanks	Shawand S.	14.0000	Hourly	Full Time	4,816.00
128	Edwards	Kenzie M.	14.0000	Hourly	Full Time	4,816.00
129	Edwards	Peterson D.	14.0000	Hourly	Full Time	4,816.00
130	Edwards	Tytiana T.	14.0000	Hourly	Full Time	4,816.00
131	Elkins	Amy M.	20.4800	Hourly	Full Time	7,045.12
132	Escarment	Verlencia	15.0000	Hourly	Part Time	2,828.57
133	Espejo	Amelia R.	14.0000	Hourly	Full Time	4,816.00
134	Essex	Kaytlyn	14.0000	Hourly	Full Time	4,816.00
135	Ferrell	Tashya	14.0000	Hourly	Full Time	4,816.00
136	Fifer	Breanne C.	21.6346	Salaried	Full Time	7,417.56
137	Fishpaw	Austin A.	18.0000	Hourly	Full Time	6,192.00
138	Flanagan	Lorraine	14.0000	Hourly	Full Time	4,816.00
139	Flanary	Coralee D.	14.0000	Hourly	Full Time	4,816.00
140	Fleming	Rachel J.	28.8462	Salaried	Full Time	9,890.08
141	Fletcher	Cherish B.	14.0000	Hourly	Full Time	4,816.00
142	Flowers	Mesha D.	36.0577	Salaried	Full Time	12,362.60
143	Fortman	Sara	14.0000	Hourly	Full Time	4,816.00
144	Foxworth	Shaunte	14.0000	Hourly	Part Time	1,260.00
145	Francis	Sharmilla	15.0000	Hourly	Part Time	2,828.57
146	Francois	Kenyardi M.	14.0000	Hourly	Full Time	4,816.00
147	Franklin-Griffin	Kayla L.	16.8269	Salaried	Full Time	5,769.21
148	Frazier	Jasmine	15.0000	Hourly	Full Time	5,160.00
149	Fredrick	Melody R.	22.1154	Salaried	Full Time	7,582.39
150	Frost	Breanna	15.0000	Hourly	Full Time	5,160.00
151	Fuentes	Danielle N.	27.8800	Salaried	Full Time	9,558.83
152	Fuselier	Brian	14.0000	Hourly	Full Time	4,816.00
153	GARCIA	LATRINA	14.0000	Hourly	Full Time	4,816.00
154	Garrett	Quiana	15.0000	Hourly	Full Time	5,160.00
155	Garrett	Taquilla R.	15.0000	Hourly	Full Time	5,160.00
156	Gibbs	Shakira	14.0000	Hourly	Full Time	4,816.00
157	Gibbs	Shyenne	14.0000	Hourly	Full Time	4,816.00
158	Gilliard	Theodosha	14.0000	Hourly	Full Time	4,816.00
159	Gleeton	Tamara	14.0000	Hourly	Full Time	4,816.00
160	Gomez	Fernando J.	26.4423	Salaried	Full Time	9,065.90
161	Goodwyn	Quaaneiruh	14.2500	Hourly	Full Time	4,902.00
162	Graff	Brittnee	14.0000	Hourly	Part Time	2,460.00
163	Grant	Abigail	14.0000	Hourly	Full Time	4,816.00
164	Grant	Addi J.	20.0000	Hourly	Full Time	6,880.00
165	Green	Jada	14.0000	Hourly	Full Time	4,816.00

	Last Name	First Name	Hourly Rate	Salary/Hourly	Full/Part Time	WARN Wage Damages
166	Greene	Megan M.	24.0385	Hourly	Full Time	8,269.23
167	Green-Harris	Raven	14.0000	Hourly	Full Time	4,816.00
168	Griffin Jr.	Stephen L.	14.0000	Hourly	Full Time	4,816.00
169	Gullufsen	Krista	14.0000	Hourly	Part Time	3,120.00
170	Hannah	Faith L.	14.0000	Hourly	Full Time	4,816.00
171	Hanna-Martinez	Sophia T.	16.0000	Hourly	Full Time	5,504.00
172	Hardy	Rachel	15.0000	Hourly	Part Time	2,828.57
173	Hardy	Susan	14.0000	Hourly	Full Time	4,816.00
174	Harris	Elijah	14.0000	Hourly	Full Time	4,816.00
175	Harris	Felicia	14.0000	Hourly	Full Time	4,816.00
176	Harris	Micala N.	14.0000	Hourly	Full Time	4,816.00
177	Harris	Trinity	14.0000	Hourly	Part Time	3,600.00
178	Hart	Adam	14.0000	Hourly	Full Time	4,816.00
179	Hatfield	Chelsea	14.0000	Hourly	Part Time	2,280.00
180	Hayden	Danielle N.	16.0000	Hourly	Full Time	5,504.00
181	Hayes	Whitney	14.0000	Hourly	Full Time	4,816.00
182	Hays	Alyssa M.	14.0000	Hourly	Full Time	4,816.00
183	Hearn	Noah C.	20.0000	Hourly	Full Time	6,880.00
184	Heimrich	Jea'Anna C.	22.5962	Salaried	Full Time	7,747.23
185	Henke	Abigail S.	14.0000	Hourly	Part Time	2,760.00
186	Henry	Michelle D.	14.0000	Hourly	Part Time	2,220.00
187	Henson	Myesha	14.0000	Hourly	Full Time	4,816.00
188	Herbert	Porscha N.	15.0000	Hourly	Full Time	5,160.00
189	Hernandez	Jasmine	14.0000	Hourly	Full Time	4,816.00
190	Hernandez	Marque E.	48.0769	Salaried	Full Time	16,483.46
191	Herrera	Christian A.	14.0000	Hourly	Full Time	4,816.00
192	Herring	Tytianna	14.0000	Hourly	Full Time	4,816.00
193	Hesterman	Alyssa B.	15.0000	Hourly	Full Time	5,160.00
194	Hicks	Natalia L.	14.0000	Hourly	Full Time	4,816.00
195	Hill	Jameka	14.0000	Hourly	Full Time	4,816.00
196	Hinkforth	Justin	14.0000	Hourly	Full Time	4,816.00
197	Hite	Kristopher C.	14.2500	Hourly	Full Time	4,902.00
198	Holmes	Lindsay M.	20.1923	Salaried	Full Time	6,923.05
199	Holtzberger	Chantel R.	16.0000	Hourly	Full Time	5,504.00
200	Homer	Kaley R.	14.0000	Hourly	Full Time	4,816.00
201	Horne	Nyesha	14.0000	Hourly	Full Time	4,816.00
202	Howard	Kyle	14.0000	Hourly	Full Time	4,816.00
203	Howell	Zoey M.	14.0000	Hourly	Full Time	4,816.00
204	Huber	Eliseo	14.0000	Hourly	Full Time	4,816.00
205	Huerta	Alina A.	15.0000	Hourly	Full Time	5,160.00
206	Hughes	Darmeika G.	23.5550	Salaried	Full Time	8,075.97
207	Hutchison	Shanika	14.0000	Hourly	Part Time	3,600.00
208	Ingram	Radiance	14.0000	Hourly	Part Time	3,060.00
209	Inniss	Aidien	14.0000	Hourly	Full Time	4,816.00
210	Jackson	Chasity L.	16.5000	Hourly	Full Time	5,676.00
211	Jackson	Isaac	14.0000	Hourly	Full Time	4,816.00
212	Jackson	Keenan	14.0000	Hourly	Full Time	4,816.00
213	James	VaNiyah	14.0000	Hourly	Full Time	4,816.00
214	Jenkins	Rachelle	15.0000	Hourly	Part Time	2,057.14
215	Jenkins	Ragean J.	15.0000	Hourly	Part Time	2,828.57
216	Johnson	Angela K.	14.0000	Hourly	Full Time	4,816.00
217	Johnson	Cassie N.	18.2692	Salaried	Full Time	6,263.72
218	Johnson	Chelsea L.	14.0000	Hourly	Full Time	4,816.00
219	Johnson	Denise D.	20.1923	Salaried	Full Time	6,923.05
220	Johnson	Lakesha	14.0000	Hourly	Part Time	4,020.00

	Last Name	First Name	Hourly Rate	Salary/Hourly	Full/Part Time	WARN Wage Damages
221	Johnson	Zandra	14.0000	Hourly	Full Time	4,816.00
222	Jones	Sierra R.	14.0000	Hourly	Full Time	4,816.00
223	Jones	Telisha	14.0000	Hourly	Full Time	4,816.00
224	Joniaux	Brittany	14.0000	Hourly	Full Time	4,816.00
225	Joseph	Christopher	14.0000	Hourly	Full Time	4,816.00
226	Joyner	Margarita	14.0000	Hourly	Full Time	4,816.00
227	Kalu	Angel	14.0000	Hourly	Full Time	4,816.00
228	Keeran	Jessica M.	18.1500	Hourly	Full Time	6,243.60
229	Kemp	Symphony L.	14.0000	Hourly	Full Time	4,816.00
230	Kendrick III	John L.	14.0000	Hourly	Part Time	2,580.00
231	Kennedy	Alyssa	15.0000	Hourly	Full Time	5,160.00
232	Kilbourn	Victoria	14.0000	Hourly	Full Time	4,816.00
233	Kindilien	Michele L.	17.3077	Hourly	Full Time	5,953.85
234	King	Jantel	14.0000	Hourly	Part Time	2,640.00
235	King	Mysha K.	14.0000	Hourly	Full Time	4,816.00
236	King	Ricardo A.	120.1923	Salaried	Full Time	41,208.65
237	Kirksey	Michael	14.0000	Hourly	Full Time	4,816.00
238	Kirksey	Tierra	14.0000	Hourly	Full Time	4,816.00
239	Kosovich	Kenneth R.	21.6346	Salaried	Full Time	7,417.56
240	Krill	Britny M.	14.0000	Hourly	Full Time	4,816.00
241	Kulczyk	Caitlin	14.0000	Hourly	Full Time	4,816.00
242	LaBelle	Jessica	14.0000	Hourly	Part Time	2,460.00
243	Lacy	Christina L.	18.4200	Salaried	Full Time	6,315.41
244	Laform	Ashton B.	14.0000	Hourly	Full Time	4,816.00
245	Laverde	Nathalia	14.0000	Hourly	Part Time	2,700.00
246	Leatch-Williams	Gay Y.	14.0000	Hourly	Full Time	4,816.00
247	Leininger	Theresa K.	14.0000	Hourly	Full Time	4,816.00
248	Limon	Justene	14.0000	Hourly	Part Time	1,620.00
249	Link	Amber Jo R.	18.2692	Salaried	Full Time	6,263.72
250	Logan	Colonda	14.0000	Hourly	Part Time	2,400.00
251	Lora	Anushka	15.0000	Hourly	Full Time	5,160.00
252	Lubin	Duvivier	14.0000	Hourly	Full Time	4,816.00
253	Lynott	Paula A.	16.0000	Hourly	Full Time	5,504.00
254	Madewell	Marisa	14.0000	Hourly	Part Time	1,500.00
255	Magazine	Aque	14.2500	Hourly	Full Time	4,902.00
256	Maiden	Reanna	14.0000	Hourly	Full Time	4,816.00
257	Malinasky	Tayler	14.0000	Hourly	Full Time	4,816.00
258	Marchese	Giuliana	14.0000	Hourly	Full Time	4,816.00
259	Martin	Kyla	14.0000	Hourly	Full Time	4,816.00
260	Mccardell	Macknicha	14.0000	Hourly	Full Time	4,816.00
261	McCarter	Bekah L.	14.0000	Hourly	Full Time	4,816.00
262	McFarland	Constance	14.0000	Hourly	Full Time	4,816.00
263	Mendez	Olivia J.	19.0000	Hourly	Full Time	6,536.00
264	Mendoza	Angela N.	12.0000	Hourly	Full Time	4,128.00
265	Meneese	Alana	14.0000	Hourly	Full Time	4,816.00
266	Metcalf	James W.	33.6538	Salaried	Full Time	11,538.42
267	Miller	Destiny	14.0000	Hourly	Full Time	4,816.00
268	Miller	Julie W.	14.0000	Hourly	Full Time	4,816.00
269	Miller	Kelly J.	18.8000	Hourly	Part Time	2,578.29
270	Miller (Cadle)	Angel M.	16.0000	Hourly	Full Time	5,504.00
271	Minor	Prisilla	14.0000	Hourly	Part Time	3,060.00
272	Mitchell	Amber M.	16.0000	Hourly	Full Time	5,504.00
273	Mitchell Sr.	Jalil K.	14.0000	Hourly	Full Time	4,816.00
274	Moats	Noah W.	14.0000	Hourly	Full Time	4,816.00
275	Mobley	Florence	14.0000	Hourly	Full Time	4,816.00

	Last Name	First Name	Hourly Rate	Salary/Hourly	Full/Part Time	WARN Wage Damages
276	Mohamed	Mohamed	14.0000	Hourly	Part Time	4,800.00
277	Montes	Elizabeth S.	17.7300	Hourly	Full Time	6,099.12
278	Moore	Erica	14.0000	Hourly	Full Time	4,816.00
279	Moore Jr.	Jamal	14.0000	Hourly	Full Time	4,816.00
280	Morris	LaKeya M.	15.0000	Hourly	Part Time	2,828.57
281	Morrison	Stacy B.	27.4038	Salaried	Full Time	9,395.57
282	Mower	Jennifer L.	14.0000	Hourly	Full Time	4,816.00
283	Moyer	Christen N.	14.0000	Hourly	Full Time	4,816.00
284	Mozo	Doricela N.	16.0000	Hourly	Full Time	5,504.00
285	Mucherson	Destiney M.	14.0000	Hourly	Full Time	4,816.00
286	Mueller	Amber	14.0000	Hourly	Part Time	2,460.00
287	Mueller	Jeffery	14.0000	Hourly	Full Time	4,816.00
288	Murray	Amanda L.	19.0100	Hourly	Full Time	6,539.44
289	Nails	Temerria L.	14.0000	Hourly	Full Time	4,816.00
290	Nash	Tamaresha	14.0000	Hourly	Full Time	4,816.00
291	Neuenschwander	Britzi M.	14.0000	Hourly	Part Time	2,160.00
292	Newsome	Troyan S.	14.0000	Hourly	Part Time	3,060.00
293	Nicholas	Arielle N.	14.0000	Hourly	Full Time	4,816.00
294	Nichols	Holland T.	28.0000	Salaried	Full Time	9,599.97
295	Noel	Emily R.	20.2100	Hourly	Full Time	6,952.24
296	Noriega	Heidy	15.0000	Hourly	Part Time	2,828.57
297	Obee	Maliik	14.0000	Hourly	Full Time	4,816.00
298	Ohren	Joshua F.	18.4200	Hourly	Full Time	6,336.48
299	O'Leary	Kayla R.	19.0000	Hourly	Full Time	6,536.00
300	O'Neal	Tavares	14.0000	Hourly	Full Time	4,816.00
301	Osborne	Jared Z.	21.6300	Hourly	Full Time	7,440.72
302	Owens	Alexis	14.0000	Hourly	Full Time	4,816.00
303	Owens	Shayne J.	15.0000	Hourly	Part Time	2,828.57
304	Owensby	Jade	15.0000	Hourly	Full Time	5,160.00
305	Pagan	Crismari	14.0000	Hourly	Full Time	4,816.00
306	Pagan	Sydni	14.0000	Hourly	Full Time	4,816.00
307	Pang	Chiwah	15.0000	Hourly	Full Time	5,160.00
308	Parker	Collin A.	18.2692	Salaried	Full Time	6,263.72
309	Patterson	Domynique	14.0000	Hourly	Full Time	4,816.00
310	Payne	Clayton	14.0000	Hourly	Full Time	4,816.00
311	Payne	Kenneth	14.0000	Hourly	Full Time	4,816.00
312	PeeHolder	Rose	15.0000	Hourly	Full Time	5,160.00
313	Peete	Bria	14.0000	Hourly	Full Time	4,816.00
314	Pena	Kiara	14.0000	Hourly	Part Time	2,400.00
315	Peterson (LaChance)	Meagan L.	17.7600	Hourly	Full Time	6,109.44
316	Petrichor	Nicholas E.	14.0000	Hourly	Full Time	4,816.00
317	Pickens	Gail L.	14.0000	Hourly	Full Time	4,816.00
318	Pickett	Porchia L.	14.0000	Hourly	Full Time	4,816.00
319	Pierre	Mydine B.	14.0000	Hourly	Part Time	2,520.00
320	Pirzada	Fariha	14.0000	Hourly	Full Time	4,816.00
321	Powell	Whitney A.	14.0000	Hourly	Full Time	4,816.00
322	Prado	Alexandra N.	16.0000	Hourly	Full Time	5,504.00
323	Price	Jahneel	14.0000	Hourly	Full Time	4,816.00
324	Primeau	Matthew T.	14.0000	Hourly	Full Time	4,816.00
325	Prymer	Andra L.	14.0000	Hourly	Full Time	4,816.00
326	Quigley	Jacob	14.0000	Hourly	Full Time	4,816.00
327	Ramsey	Elizabeth	14.0000	Hourly	Full Time	4,816.00
328	Reed	Deborah A.	16.0000	Hourly	Full Time	5,504.00
329	Reed	Mackie	15.0000	Hourly	Full Time	5,160.00
330	Reed (Gomes De Souza)	Stephannie L.	28.8462	Salaried	Full Time	9,890.08

	Last Name	First Name	Hourly Rate	Salary/Hourly	Full/Part Time	WARN Wage Damages
331	Reid	Shuntoria	15.0000	Hourly	Part Time	2,828.57
332	Reyna	April	15.0000	Hourly	Full Time	5,160.00
333	Reynolds	Jamie E.	14.0000	Hourly	Full Time	4,816.00
334	Richey	Loren	14.0000	Hourly	Part Time	3,060.00
335	Ridgway	Devin L.	24.0385	Salaried	Full Time	8,241.73
336	Rivas	Summer L.	15.0000	Hourly	Full Time	5,160.00
337	Rivera	Ivanjenny	15.0000	Hourly	Part Time	2,700.00
338	Roberts	Nickisha	14.0000	Hourly	Full Time	4,816.00
339	Robinson	Amanda T.	14.0000	Hourly	Full Time	4,816.00
340	Robinson	Daejah	14.0000	Hourly	Full Time	4,816.00
341	Rodriguez	Ciji	15.0000	Hourly	Full Time	5,160.00
342	Rogers	An'Dra E.	14.0000	Hourly	Part Time	2,760.00
343	Routson II	Christopher C.	14.0000	Hourly	Part Time	2,220.00
344	Royal	Kaige M.	25.0000	Hourly	Full Time	8,600.00
345	Sam	Brandon J.	14.0000	Hourly	Part Time	1,680.00
346	Sanchez	Ashley R.	15.0000	Hourly	Full Time	5,160.00
347	Sanchez-Alvarez	Melissa	14.0000	Hourly	Part Time	1,800.00
348	Santiago	Andializ	14.0000	Hourly	Full Time	4,816.00
349	Sasse	Kayla	14.0000	Hourly	Full Time	4,816.00
350	Savini	Commodius	15.0000	Hourly	Full Time	5,160.00
351	Savoy	Tanya	14.0000	Hourly	Full Time	4,816.00
352	Saxton	Trinity E.	14.0000	Hourly	Full Time	4,816.00
353	Scattergood	Jane E.	16.0000	Hourly	Full Time	5,504.00
354	Schatz	Melissa L.	21.6346	Salaried	Full Time	7,417.56
355	Schorling	Timothy S.	16.0000	Hourly	Full Time	5,504.00
356	Schumacher	Trinity	15.0000	Hourly	Full Time	5,160.00
357	Scott	Alyssa M.	14.0000	Hourly	Full Time	4,816.00
358	Seldon	Jakira	14.0000	Hourly	Full Time	4,816.00
359	Sello	April D.	14.0000	Hourly	Full Time	4,816.00
360	Senior	Yuleisi A.	14.0000	Hourly	Full Time	4,816.00
361	Sephus	Nyla M.	14.0000	Hourly	Full Time	4,816.00
362	Shabazz	Kalifa	15.0000	Hourly	Full Time	5,160.00
363	Shawoosh	Desiree N.	16.0000	Hourly	Full Time	5,504.00
364	Shenuski	Alina	15.0000	Hourly	Part Time	2,700.00
365	Shingleton	Juliaann M.	14.0000	Hourly	Full Time	4,816.00
366	Shirley	Kaysonie	15.0000	Hourly	Full Time	5,160.00
367	Shook	Pamela S.	14.0000	Hourly	Full Time	4,816.00
368	Simmons	Alies	14.0000	Hourly	Full Time	4,816.00
369	Simpson	Mikalalah	14.0000	Hourly	Full Time	4,816.00
370	Sims	Tyler G.	14.0000	Hourly	Full Time	4,816.00
371	Small	Ann M.	16.3900	Hourly	Full Time	5,638.16
372	Smith	Andrilei	15.0000	Hourly	Full Time	5,160.00
373	Smith	Britney	14.0000	Hourly	Full Time	4,816.00
374	Smith	Janecia S.	14.0000	Hourly	Full Time	4,816.00
375	Smith	Kierstin	14.0000	Hourly	Part Time	2,280.00
376	Smith	Sade L.	14.0000	Hourly	Part Time	2,520.00
377	Snider	Gage A.	24.0385	Hourly	Full Time	8,269.23
378	Sowers	Samantha R.	14.0000	Hourly	Full Time	4,816.00
379	Spalding Smith	Taylor	14.0000	Hourly	Full Time	4,816.00
380	Spotts	Jazmynique	14.0000	Hourly	Full Time	4,816.00
381	Stantz	Jessica D.	14.0000	Hourly	Full Time	4,816.00
382	Stantz	Kenyotta L.	19.2308	Salaried	Full Time	6,593.38
383	Stark	Kaylyn R.	24.0385	Salaried	Full Time	8,241.73
384	Starry	Michelle A.	23.0000	Salaried	Full Time	7,885.69
385	Stevens	Jennifer	14.0000	Hourly	Full Time	4,816.00

	Last Name	First Name	Hourly Rate	Salary/Hourly	Full/Part Time	WARN Wage Damages
386	Stewart	Jasmin	15.0000	Hourly	Full Time	5,160.00
387	Stewart	Shania	14.0000	Hourly	Full Time	4,816.00
388	Stewart	Tiffany	14.0000	Hourly	Full Time	4,816.00
389	Stokes	LaShara	14.0000	Hourly	Part Time	2,520.00
390	Stork	Caitlynn G.	19.1200	Hourly	Full Time	6,577.28
391	Stout	Leilani	14.0000	Hourly	Full Time	4,816.00
392	Stout	Shauna J.	20.0000	Hourly	Full Time	6,880.00
393	Strain	Tracey E.	14.7500	Hourly	Full Time	5,074.00
394	Strickland	Justice	18.2692	Salaried	Full Time	6,263.72
395	Sullivan	Danielle M.	31.2500	Salaried	Full Time	10,714.25
396	Sweinhagen	Kalee L.	14.0000	Hourly	Full Time	4,816.00
397	Tague	Brandon A.	14.0000	Hourly	Full Time	4,816.00
398	Taylor	Mya	14.0000	Hourly	Part Time	3,300.00
399	Tedrow	Amanda W.	14.0000	Hourly	Full Time	4,816.00
400	Temple	Tyler A.	14.0000	Hourly	Full Time	4,816.00
401	Tenego	Duriane	14.0000	Hourly	Full Time	4,816.00
402	Thomas	David L.	31.2500	Salaried	Full Time	10,714.25
403	Thomas	Khalile	14.0000	Hourly	Full Time	4,816.00
404	Thompson	Jamiah L.	14.0000	Hourly	Full Time	4,816.00
405	Thompson	Olivia	16.0000	Hourly	Full Time	5,504.00
406	Thornsberry	Rachael H.	17.5000	Hourly	Full Time	6,020.00
407	Tillman	Jacoria A.	14.0000	Hourly	Full Time	4,816.00
408	Tinney	Chana	14.0000	Hourly	Full Time	4,816.00
409	Toledo	Joseph G.	28.8462	Salaried	Full Time	9,890.08
410	Toth	Michael S.	14.0000	Hourly	Full Time	4,816.00
411	Turney	Caron	14.0000	Hourly	Full Time	4,816.00
412	Turner	Kimberly M.	14.0000	Hourly	Full Time	4,816.00
413	Tyson	Krissy E.	14.0000	Hourly	Full Time	4,816.00
414	Upchurch	Lakesha	14.0000	Hourly	Full Time	4,816.00
415	Valdez	Jeremiah	14.0000	Hourly	Full Time	4,816.00
416	Valdiserri	Jay	14.0000	Hourly	Full Time	4,816.00
417	Van Curen	KayLyne R.	14.0000	Hourly	Full Time	4,816.00
418	Van Hook	Nathan J.	14.0000	Hourly	Full Time	4,816.00
419	Vandemark	Jessica L.	40.8654	Salaried	Full Time	14,010.94
420	Vaughan	Kelsey M.	14.0000	Hourly	Full Time	4,816.00
421	Vaughn	Paris	14.0000	Hourly	Full Time	4,816.00
422	Venable	Traniece	14.0000	Hourly	Full Time	4,816.00
423	Wann	Christopher	14.0000	Hourly	Full Time	4,816.00
424	Ward	Sarah	14.0000	Hourly	Part Time	2,040.00
425	Washington	Tyra	14.0000	Hourly	Full Time	4,816.00
426	Watson	Candice	14.0000	Hourly	Full Time	4,816.00
427	Watts	Eeliana M.	14.0000	Hourly	Full Time	4,816.00
428	Webb	Samantha C.	16.0000	Hourly	Full Time	5,504.00
429	Wells	Alanna	14.0000	Hourly	Full Time	4,816.00
430	Westbrook	Diamond	14.0000	Hourly	Full Time	4,816.00
431	Whaley	Jamillah C.	14.0000	Hourly	Full Time	4,816.00
432	Whaley	Jessica M.	14.0000	Hourly	Full Time	4,816.00
433	White	Mario	14.0000	Hourly	Full Time	4,816.00
434	Whitehead	Tenecia N.	14.0000	Hourly	Full Time	4,816.00
435	Wilkins	Amber M.	14.0000	Hourly	Full Time	4,816.00
436	Williams	Alonzo	14.0000	Hourly	Full Time	4,816.00
437	Williams	Darlene N.	15.3000	Hourly	Full Time	5,263.20
438	Williams	Lakeisha	14.0000	Hourly	Part Time	2,700.00
439	Williams	Lakendria	14.0000	Hourly	Full Time	4,816.00
440	Williams	Richard I.	14.0000	Hourly	Full Time	4,816.00

	Last Name	First Name	Hourly Rate	Salary/Hourly	Full/Part Time	WARN Wage Damages
441	Williams	Tamiesha L.	14.0000	Hourly	Full Time	4,816.00
442	Wilson	Brian C.	15.0000	Hourly	Full Time	5,160.00
443	Wilson	Jenna W.	20.1923	Salaried	Full Time	6,923.05
444	Wilson	Lacey	14.0000	Hourly	Full Time	4,816.00
445	Wilson	Patrice	14.0000	Hourly	Full Time	4,816.00
446	Wilson	Tashia M.	14.0000	Hourly	Full Time	4,816.00
447	Woodley	Lashonna	15.0000	Hourly	Full Time	5,160.00
448	Woods	Kanisha T.	16.0000	Hourly	Full Time	5,504.00
449	Woolley	Brendan	15.0000	Hourly	Full Time	5,160.00
450	Wright	Chanda C.	14.0000	Hourly	Full Time	4,816.00
451	Wright	Kemia	14.0000	Hourly	Full Time	4,816.00
452	Wright	Tiara	14.0000	Hourly	Part Time	2,520.00
453	Yoho	Tessa A.	14.0000	Hourly	Full Time	4,816.00
454	Youngker	Rachel M.	33.6538	Salaried	Full Time	11,538.42
455	Zendejas	Nehemiah P.	15.0000	Hourly	Full Time	5,160.00

2,403,667.98

EXHIBIT 2

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
WESTERN DIVISION

Theresa Leininger,
on behalf of herself and all others
similarly situated,

Plaintiff,

-vs-

Mammoth Tech Inc.,

Defendant.

Case No. 3:22 CV 394

ORDER APPROVING RENEWED
REQUEST FOR DEFAULT JUDGMENT
FOLLOWING CLASS CERTIFICATION

JUDGE JACK ZOUHARY

Before this Court is the renewed Motion (Doc. 16) by Theresa Leininger (“Plaintiff” or “Class Representative”) on behalf of herself and on behalf of the certified class of similarly situated former employees she represents (the “Class”) for default judgment and quantification of damages against Defendant Mammoth Tech, Inc. (“Defendant”) pursuant to Federal Civil Rule 55, on the grounds that Defendant failed to answer Plaintiff’s Complaint and has failed to appear or otherwise defend this action. The relief sought in Plaintiff’s renewed Motion, adequately supported, provides sufficient evidence to reasonably demonstrate the amount of the Class WARN Act wages owed under 29 U.S.C. § 2104(a)(1)(A).

On March 11, 2022, Plaintiff filed the above captioned litigation (the “WARN Litigation”) on behalf of herself and on behalf of all similarly situated former employees against Defendant to recover sixty (60) days’ pay and benefits under the Worker Adjustment and Retraining Notification (WARN) Act of 1988 (29 U.S.C. §§ 2101 - 2109) (Doc. 1).

Defendant was served pursuant to Federal Civil Rule 4(e) with the Summons and Complaint via certified mail at 1250 Geneva Boulevard, Defiance, OH 43512 (Defendant's business address listed with the State of Ohio) on March 19, 2022. Given the date of service, response was due on April 11, 2022. Defendant failed to respond.

In the WARN Litigation, Plaintiff alleges that she, along with nearly five hundred other similarly situated former employees (the "Other Similarly Situated Former Employees"), suffered an employment loss, without cause on their part, as a result of the plant closing ordered by Defendant at its facility located in Defiance, OH (the "Facility") on or about March 2, 2022. Plaintiff further alleges that, prior to their terminations, neither Plaintiff nor the Other Similarly Situated Former Employees received written notice that complied with the requirements of the WARN Act.

The WARN Act requires, in general, that an employer give sixty days' advance written notice to affected employees before ordering a mass layoff or plant closing. *See* 29 U.S.C. § 2102. *See also Calloway v. Caraco Pharm. Labs., Ltd.*, 800 F.3d 244, 251 (6th Cir. 2015) ("The WARN Act requires employers to give a 60-day notice to affected employees before a plant closing or mass layoff."). The goal of the WARN Act is to "give workers and their families some transition time to adjust to the prospective loss of employment, to seek and obtain alternative jobs and, if necessary, to enter skill training or retraining that will allow these workers to successfully compete in the job market." *Calloway*, 800 F.3d at 251, (*quoting* 20 C.F.R. § 639.1(a)). The notice must be given by a method that is reasonably designed to ensure "receipt of notice at least 60 days before separation." 20 C.F.R. § 639.8.

The general rule under the WARN Act is that notice must be given sixty days in advance, 29 U.S.C. § 2102(a); and if notice is not given, then the employer is liable for back pay to each

aggrieved employee for “each day of the violation,” 29 U.S.C. § 2104(a). Courts have consistently held that an employer that does not comply with the WARN Act’s statutory notice mandate is barred from relying on any WARN statutory defenses as a matter of law and is liable for the full sixty days’ wages and benefits for each affected employee. *See, e.g., In re Quantegy, Inc.*, 343 B.R. 689, 695–96 (Bankr. D. Ala. 2006); *In re Tweeter Opco, Inc.*, 453 B.R. 534, 546–47 (Bankr. D. Del. 2011); *Organogenesis*, 331 B.R. 500 (D. Mass. 2005).

On July 14, 2022, Plaintiff applied for entry of default (Doc. 5) and also filed a Motion for default judgment, setting limited discovery and a hearing on damages (Doc. 6).

On July 15, 2022, the Clerk entered a default against Defendant (Doc. 7).

On August 16, 2022, this Court entered a notice of hearing on Plaintiffs’ Motion for default. The hearing was set for September 9, 2022.

On September 6, 2022, Plaintiff’s counsel filed a declaration in support of default judgment and damages (Doc. 8).

On September 9, 2022, this Court expressed concerns that a class had not been certified and later entered an Order granting Plaintiff leave to file supplemental materials by October 10, 2022.

Plaintiff then filed a motion to extend the time period to submit supplemental materials through and including October 20, 2022 (Doc. 13). This motion was granted on October 11, 2022.

On October 20, 2022, Plaintiff filed a motion for class certification (Doc. 14). The WARN Act allows a person seeking to enforce WARN liability to sue on behalf of other persons similarly situated. 29 U.S.C. § 2104(a)(5).

On November 1, 2022, this Court held a hearing on the motion for class certification. During the hearing, this Court signaled the motion for class certification should be granted.

On November 3, 2022, this Court entered an Order certifying a class pursuant to Federal Civil Rule 23 comprised of all former employees of Defendant who worked at, or reported to, or were assigned work from the facility located at 1250 Geneva Boulevard, Defiance, OH 43512 (the “Facility”) and were terminated, without cause on their part, on or about March 2, 2022 and thereafter, who do not file a timely request to opt-out of the class (the “Class”); (b) appointing Plaintiff as Class Representative; (c) appointing The Gardner Firm, P.C., Lankenau & Miller, LLP and Brennan, Manna & Diamond, LLC as Class Counsel; (d) approving the form and manner of Notice to the Class. (Doc. 15)

Notice to the class was to be mailed within ten days of entry of the Order and any Class members who wished to opt-out were to complete and submit an opt-out form (included with the Class Notice) no later than thirty-five days after the date of mailing. All requests for exclusion received after that date would not be effective, and any person who sent a late request would be a member of the Class and would be bound in the same way and to the same extent as all other Class Members. (Id.)

As shown in the Declaration of Class Counsel (Doc. 16-1), this Court-approved Class Notice was mailed to the Class members on November 11, 2022 and contained an opt-out deadline of December 16, 2022. Only one Class member (Mackenzie R. Monteith) chose to exclude by submitting a timely opt-out form to Class Counsel.

On December 20, 2022, this Court entered an Order denying the motion for default without prejudice and permitting Plaintiff to renew the damages request following establishment of Class membership.

On March 1, 2023, Plaintiff filed a renewed motion for default, with supporting evidence, following class certification (Doc. 16).

In the renewed motion, Plaintiff seeks WARN Act pay for herself and each of the Class members, as reflected on the Class spreadsheet (Doc. 16-3). Plaintiff's renewed request for damages reasonably demonstrates that the Class WARN Act wages owed under 29 U.S.C. § 2104(a)(1)(A) of the WARN Act are, in the aggregate, Two Million Four Hundred Three Thousand Six Hundred Sixty-Seven Dollars and Ninety-Eight Cents (\$2,403,667.98) (*see* Doc. 16-3).

Accordingly, this Court awards, and judgment is entered, in favor of the Plaintiff Class in the aggregate amount of Two Million Four Hundred Three Thousand Six Hundred Sixty-Seven Dollars and Ninety-Eight Cents (\$2,403,667.98).

IT IS SO ORDERED.

s/ Jack Zouhary
JACK ZOUHARY
U. S. DISTRICT JUDGE

March 29, 2023